



90-890000642
CONTAINS NO CBI

Inter Office

North American Automotive Operations
Utica Trim Plant

September 12, 1989

Document Processing Center
Office of Toxic Substances, TS-790
U. S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Attention: CAIR Reporting Office

Subject: Comprehensive Assessment Information Rule (CAIR)
Report Submittal

Attached is the Ford Utica Plant CAIR Report submitted pursuant EPA regulation 40 CFR 704. We voluntarily submit this report in good faith, notwithstanding our belief that we do not fall under the CAIR definition of "processor" that requires us to submit this report. CAIR defines "processing activities" in the preamble of the regulations (53 FR 51700) to include:

- > use of a listed substance after its manufacture to make another substance for sale or use,
- > repackaging of a listed substance, or
- > purchasing and preparing a listed substance for use or distribution in commerce.

None of the activities for which we are reporting are covered by the processor definition, as we are an "end user" in which a listed substance (toluene diisocyanate, TDI) is used "on-site in its end-use capacity" in the manufacture of an article that no longer contains the listed substance.

Please contact J. Glaser, Industrial Relations Manager, at (313)826-0013 if additional assistance is required.

Sincerely yours,


R. R. Gould
Plant Manager

09 SEP 10 AM 0:48
UTICA TRIM PLANT



Form Approved
OMB No. 2010-0019
Approval Expires 12-31-89



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90-890000642

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Comprehensive Assessment Information Rule
REPORTING FORM

SEP 19 1989
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When completed, send this form to:

Document Processing Center
Office of Toxic Substances, TS-790
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460
Attention: CAIR Reporting Office

For Agency Use Only:

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Control Number: _____

Docket Number: _____

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been completed in response to the Federal Register Notice of..... [0][6][1][4][8][9]
CBI mo. day year

☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. [0][2][6][4][7][1]-[6][2]-[5]

b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.

(i) Chemical name as listed in the rule N/A

(ii) Name of mixture as listed in the rule N/A

(iii) Trade name as listed in the rule N/A

c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

Name of category as listed in the rule N/A

CAS No. of chemical substance [][][][][][]-[][]-[]

Name of chemical substance N/A

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

CBI Manufacturer 1

☐ Importer 2

*Processor 3

X/P manufacturer reporting for customer who is a processor 4

X/P processor reporting for customer who is a processor 5

* None of the activities for which we are reporting are covered by the processor definition, as we are a "end user" in which the listed substance (TDI) is used "on-site" in its end-use capacity" in manufacturing an article that no longer contains the listed substance.

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI

Yes ☐ Go to question 1.04

☐

No ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI

Yes 1

☐

No 2

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s) Alpha-Centurian

A & M Associates

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI

Trade name N/A

☐

Is the trade name product a mixture? Circle the appropriate response.

Yes 1

No 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI

☐ "I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

R. R. Gould

NAME

*

R. R. Gould

SIGNATURE

9.12.89

DATE SIGNED

Plant Manager

TITLE

(313)

826 - 0005

TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You ☐ are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

| | | | |
|-------|-------|---------------|-----------------------------|
| N/A | _____ | _____ | _____ |
| | NAME | SIGNATURE | DATE SIGNED |
| _____ | () | _____ | _____ |
| TITLE | | TELEPHONE NO. | DATE OF PREVIOUS SUBMISSION |

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI ☐ "My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

| | | | |
|-------|-------|---------------|-------------|
| N/A | _____ | _____ | _____ |
| | NAME | SIGNATURE | DATE SIGNED |
| _____ | () | _____ | _____ |
| TITLE | | TELEPHONE NO. | |

☐ Mark (X) this box if you attach a continuation sheet.

1.09 Facility Identification

Dun & Bradstreet Number[1][2]-[3][5][9]-[5][1][0][0]

EPA ID Number[0][0][5][3][7][9][8][5][4]

Employer ID Number38-..[-][0][5][4][9][1][9][0]

Primary Standard Industrial Classification (SIC) Code[3][7][1][4]

Other SIC Code[-][-][-][-]

Other SIC Code[-][-][-][-]

Dun & Bradstreet Number[0][0]-[1][3][4]-[4][7][4][6]

Employer ID Number[N][/][A][][][][][][]

6

1.11 Parent Company Identification

CBI Name [F][O][R][D][][M][O][T][O][R][][C][O][][][][][][][][][][][][][][][][]

[illegible]

[D][E][A][R][B][O][R][N] [] [] [] [] [] [] [] [] [] [] [] [] [] []
City

[M] [I] [4] [8] [1] [2] [1]--[] [] [] []

State Zip

Dun & Bradstreet Number[0][0]-[1][3][4]-[4,7][4][6]

1.12 Technical Contact

CBI Name G E O R G E Z A H A

[illegible]

Address [5][0]5[0]0[M]O[U]N[D][R][D]

Street

[illegible]

M I 4 8 0 8 7--

State Zip

Telephone Number[3][1][3]-[8][2][6]-[0][3][9][9]

1.13 This reporting year is from

| | |
|-----|---|
| 0 | 1 |
| Mo. | |

| | |
|------|---|
| 8 | 8 |
| Year | |

 to

| | |
|-----|---|
| 1 | 2 |
| Mo. | |

| | |
|------|---|
| 8 | 8 |
| Year | |

☐ Mark (X) this box if you attach a continuation sheet.

1.14 Facility Acquired -- If you purchased this facility during the reporting year, provide the following information about the seller:

[illegible][illegible]

Street

[]

City

[] [] [] [] [] [] -- [] [] [] []

State

Zio

Employer ID Number[][][][][][][][]

Date of Sale [] [] [] [] [] []

Mo.

Da v

Year

[illegible]

Telephone Number() () () - () () () - () () () ()

1.15 Facility Sold -- If you sold this facility during the reporting year, provide the following information about the buyer:

CBI Name of Buyer [N][/]A[]

[illegible]

Street

[illegible]

City

[] [] [] [] [] [] [] -- [] [] [] []

State

Zid

Employer ID Number[][][][][][][][]

Date of Purchase [] [] [] [] [] []

Mo.

Day

Year

[illegible]

Telephone Number[] [] [] - [] [] [] - [] [] [] []

☐ Mark (X) this box if you attach a continuation sheet.

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

| <u>Classification</u> | <u>Quantity (kg/yr)</u> |
|--|-------------------------|
| <input type="checkbox"/> Manufactured | 0 |
| Imported | 0 |
| Processed (include quantity repackaged) | 3,049,020.20 kg |
| Of that quantity manufactured or imported, report that quantity: | |
| In storage at the beginning of the reporting year | 0 |
| For on-site use or processing | 0 |
| For direct commercial distribution (including export) | 0 |
| In storage at the end of the reporting year | 0 |
| Of that quantity processed, report that quantity: | |
| In storage at the beginning of the reporting year | 74,843.5 kg |
| Processed as a reactant (chemical producer) | 3,049,020.2 kg |
| Processed as a formulation component (mixture producer) | 0 |
| Processed as an article component (article producer) | 0 |
| Repackaged (including export) | 0 |
| In storage at the end of the reporting year | 74,843.5 kg |

☐ Mark (X) this box if you attach a continuation sheet.

PART C IDENTIFICATION OF MIXTURES

- 1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

CBI

☐

| Component Name | Supplier Name | Average % Composition by Weight (specify precision, e.g., 45% \pm 0.5%) |
|---------------------------------|---------------------------|--|
| <u>Toluene Diisocyanate</u> | <u>Mobay Chemical Co.</u> | <u>80 %</u> |
| <u>1,1-Methylenebis Benzene</u> | <u>Mobay Chemical Co.</u> | <u>20 %</u> |
| <u></u> | <u></u> | <u>100 %</u> |
| <u>Toluene 2,4-Diisocyanate</u> | <u>BASF Corp.</u> | <u>80 %</u> |
| <u>Toluene 2,6-Diisocyanate</u> | <u>BASF Corp.</u> | <u>20 %</u> |
| <u></u> | <u></u> | <u>100 %</u> |
| <u>Total</u> | | <u>100%</u> |

☐ Mark (X) this box if you attach a continuation sheet.

2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending [1][2] [8][7]
Mo. Year

Quantity manufactured 0 kg

Quantity imported 0 kg

Quantity processed 4,040,613 kg

Year ending [1][2] [8][6]
Mo. Year

Quantity manufactured 0 kg

Quantity imported 0 kg

Quantity processed 3,443,441 kg

Year ending [1][2] [8][5]
Mo. Year

Quantity manufactured 0 kg

Quantity imported 0 kg

Quantity processed 2,573,973 kg

2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ N/A

Continuous process 1

Semicontinuous process 2

Batch process 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all
CBI appropriate process types.

☐ Continuous process 1
Semicontinuous process 2
Batch process 3

2.07 State your facility's name-plate capacity for manufacturing or processing the listed
CBI substance. (If you are a batch manufacturer or batch processor, do not answer this
question.)

☐ Manufacturing capacity 0 kg/yr
Processing capacity 4,000,000 kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance
CBI manufactured, imported, or processed at any time after your current corporate fiscal
year, estimate the increase or decrease based upon the reporting year's production
volume.

| <input type="checkbox"/> | Manufacturing Quantity (kg) | Importing Quantity (kg) | Processing Quantity (kg) |
|--------------------------|--------------------------------|----------------------------|-----------------------------|
| Amount of increase | N/A | | |
| Amount of decrease | N/A | | |

☐ Mark (X) this box if you attach a continuation sheet.

- 2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

Days/Year Average
Hours/Day

Process Type #1 (The process type involving the largest quantity of the listed substance.)

| | | |
|--------------------|------------|------------|
| Manufactured | <u>N/A</u> | <u>N/A</u> |
| Processed | <u>238</u> | <u>16</u> |

Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)

| | | |
|--------------------|-------------------|-------------------|
| Manufactured | <u> </u> | <u> </u> |
| Processed | <u> </u> | <u> </u> |

Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)

| | | |
|--------------------|-------------------|-------------------|
| Manufactured | <u> </u> | <u> </u> |
| Processed | <u> </u> | <u> </u> |

- 2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

☐

N/A

| | | |
|---------------------------------|---|----|
| Maximum daily inventory | <u> </u> | kg |
| Average monthly inventory | <u> </u> | kg |

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

| <u>CAS No.</u> | <u>Chemical Name</u> | <u>Byproduct, Coproduct or Impurity¹</u> | <u>Concentration (%) (specify ± % precision)</u> | <u>Source of By-products, Coproducts, or Impurities</u> |
|----------------|----------------------|---|--|---|
| UK | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

¹Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct
C = Coproduct
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to ☐ the instructions for further explanation and an example.)

CBI

☐

| a. | b. | c. | d. |
|----------------------------|---|--|--------------------------------|
| Product Types ¹ | % of Quantity Manufactured, Imported, or Processed | % of Quantity Used Captively On-Site | Type of End-Users ² |
| B | 100 | 100 | CS |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

¹Use the following codes to designate product types:

| | |
|--|---|
| A = Solvent | L = Moldable/Castable/Rubber and additives |
| B = Synthetic reactant | M = Plasticizer |
| C = Catalyst/Initiator/Accelerator/ Sensitizer | N = Dye/Pigment/Colorant/Ink and additives |
| D = Inhibitor/Stabilizer/Scavenger/ Antioxidant | O = Photographic/Reprographic chemical and additives |
| E = Analytical reagent | P = Electrodeposition/Plating chemicals |
| F = Chelator/Coagulant/Sequestrant | Q = Fuel and fuel additives |
| G = Cleanser/Detergent/Degreaser | R = Explosive chemicals and additives |
| H = Lubricant/Friction modifier/Antiwear agent | S = Fragrance/Flavor chemicals |
| I = Surfactant/Emulsifier | T = Pollution control chemicals |
| J = Flame retardant | U = Functional fluids and additives |
| K = Coating/Binder/Adhesive and additives | V = Metal alloy and additives |
| | W = Rheological modifier |
| | X = Other (specify) _____ |

²Use the following codes to designate the type of end-users:

| | |
|-----------------|---------------------------|
| I = Industrial | CS = Consumer |
| CM = Commercial | H = Other (specify) _____ |

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

| a. | b. | c. | d. |
|----------------------------|---|--|--------------------------------|
| Product Types ¹ | % of Quantity Manufactured, Imported, or Processed | % of Quantity Used Captively On-Site | Type of End-Users ² |
| B | 100 | 100 | CS |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

¹Use the following codes to designate product types:

| | |
|--|---|
| A = Solvent | L = Moldable/Castable/Rubber and additives |
| B = Synthetic reactant | M = Plasticizer |
| C = Catalyst/Initiator/Accelerator/ Sensitizer | N = Dye/Pigment/Colorant/Ink and additives |
| D = Inhibitor/Stabilizer/Scavenger/ Antioxidant | O = Photographic/Reprographic chemical and additives |
| E = Analytical reagent | P = Electrodeposition/Plating chemicals |
| F = Chelator/Coagulant/Sequestrant | Q = Fuel and fuel additives |
| G = Cleanser/Detergent/Degreaser | R = Explosive chemicals and additives |
| H = Lubricant/Friction modifier/Antiwear agent | S = Fragrance/Flavor chemicals |
| I = Surfactant/Emulsifier | T = Pollution control chemicals |
| J = Flame retardant | U = Functional fluids and additives |
| K = Coating/Binder/Adhesive and additives | V = Metal alloy and additives |
| | W = Rheological modifier |
| | X = Other (specify) _____ |

²Use the following codes to designate the type of end-users:

| | |
|-----------------|---------------------------|
| I = Industrial | CS = Consumer |
| CM = Commercial | H = Other (specify) _____ |

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

☐

| a. | b. | c. | d. |
|---------------------------|--|--|--------------------------------|
| Product Type ¹ | Final Product's Physical Form ² | Average % Composition of Listed Substance in Final Product | Type of End-Users ³ |
| N/A | | | |
| | | | |
| | | | |
| | | | |
| | | | |

¹Use the following codes to designate product types:

| | |
|--|--|
| A = Solvent | L = Moldable/Castable/Rubber and additives |
| B = Synthetic reactant | M = Plasticizer |
| C = Catalyst/Initiator/Accelerator/Sensitizer | N = Dye/Pigment/Colorant/Ink and additives |
| D = Inhibitor/Stabilizer/Scavenger/Antioxidant | O = Photographic/Reprographic chemical and additives |
| E = Analytical reagent | P = Electrodeposition/Plating chemicals |
| F = Chelator/Coagulant/Sequestrant | Q = Fuel and fuel additives |
| G = Cleanser/Detergent/Degreaser | R = Explosive chemicals and additives |
| H = Lubricant/Friction modifier/Antiwear agent | S = Fragrance/Flavor chemicals |
| I = Surfactant/Emulsifier | T = Pollution control chemicals |
| J = Flame retardant | U = Functional fluids and additives |
| K = Coating/Binder/Adhesive and additives | V = Metal alloy and additives |
| | W = Rheological modifier |
| | X = Other (specify) _____ |

²Use the following codes to designate the final product's physical form:

| | |
|----------------------|---------------------------|
| A = Gas | F2 = Crystalline solid |
| B = Liquid | F3 = Granules |
| C = Aqueous solution | F4 = Other solid |
| D = Paste | G = Gel |
| E = Slurry | H = Other (specify) _____ |
| F1 = Powder | |

³Use the following codes to designate the type of end-users:

| | |
|-----------------|---------------------------|
| I = Industrial | CS = Consumer |
| CM = Commercial | H = Other (specify) _____ |

☐ Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the
CBI listed substance to off-site customers.

☐ Truck ①
Railcar 2
Barge, Vessel 3
Pipeline 4
Plane 5
Other (specify) _____ 6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers
CBI or prepared by your customers during the reporting year for use under each category
of end use listed (i-iv).

☐

Category of End Use

i. Industrial Products

Chemical or mixture 21,641 kg/yr
Article 0 kg/yr

ii. Commercial Products

Chemical or mixture 0 kg/yr
Article 0 kg/yr

iii. Consumer Products

Chemical or mixture 0 kg/yr
Article 0 kg/yr

iv. Other

Distribution (excluding export) 0 kg/yr
Export 0 kg/yr
Quantity of substance consumed as reactant 0 kg/yr
Unknown customer uses 0 kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

PART A GENERAL DATA

3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.
CBI The average price is the market value of the product that was traded for the listed substance.

☐

| <u>Source of Supply</u> | <u>Quantity (kg)</u> | <u>Average Price (\$/kg)</u> |
|--|--------------------------|----------------------------------|
| The listed substance was manufactured on-site. | | |
| The listed substance was transferred from a different company site. | | |
| The listed substance was purchased directly from a manufacturer or importer. | 4,040,613 | 2.02 |
| The listed substance was purchased from a distributor or repackager. | | |
| The listed substance was purchased from a mixture producer. | | |

3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

☐

| | |
|-----------------------|---|
| Truck | ① |
| Railcar | 2 |
| Barge, Vessel | 3 |
| Pipeline | 4 |
| Plane | 5 |
| Other (specify) _____ | 6 |

☐ Mark (X) this box if you attach a continuation sheet.

3.03 a. Circle all applicable containers used to transport the listed substance to your facility.
CBI

☐

Bags 1
Boxes 2
Free standing tank cylinders 3
Tank rail cars 4
Hopper cars 5
Tank trucks 6
Hopper trucks 7
Drums 8
Pipeline 9
Other (specify) 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders mmHg
Tank rail cars mmHg
Tank trucks mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

| <u>Trade Name</u> | <u>Supplier or Manufacturer</u> | <u>Average % Composition by Weight (specify \pm % precision)</u> | <u>Amount Processed (kg/yr)</u> |
|-------------------|-------------------------------------|---|---|
| N/A | | | |
| | | | |
| | | | |
| | | | |
| | | | |

☐ Mark (X) this box if you attach a continuation sheet.

3.03 a. Circle all applicable containers used to transport the listed substance to your
CBI facility.

N/A

☐

Bags 1
Boxes 2
Free standing tank cylinders 3
Tank rail cars 4
Hopper cars 5
Tank trucks 6
Hopper trucks 7
Drums 8
Pipeline 9
Other (specify)10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

N/A

Tank cylinders mmHg
Tank rail cars mmHg
Tank trucks mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the reporting year in the form of a class I chemical, class II chemical, or polymer, and the percent composition, by weight, of the listed substance.

☐

| | Quantity Used (kg/yr) | % Composition by Weight of Listed Sub- stance in Raw Material (specify \pm % precision) |
|-------------------|--------------------------|--|
| Class I chemical | 4,040,613 | 100 |
| | | |
| | | |
| Class II chemical | | |
| | | |
| | | |
| | | |
| Polymer | | |
| | | |
| | | |
| | | |

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

PART A PHYSICAL/CHEMICAL DATA SUMMARY

- 4.01 Specify the percent purity for the three major¹ technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

CBI

☐

| | <u>Manufacture</u> | <u>Import</u> | <u>Process</u> |
|--------------------|--------------------|----------------|--------------------|
| Technical grade #1 | _____ % purity | _____ % purity | _____ 100 % purity |
| Technical grade #2 | _____ % purity | _____ % purity | _____ % purity |
| Technical grade #3 | _____ % purity | _____ % purity | _____ % purity |

¹Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes ①

No 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company ①

Another source 2

☒ Mark (X) this box if you attach a continuation sheet.

Tox Status : C2

Product: WUC-3104-T

Supplier: BASF CORP

(UCCS: B024N)

1609 BIDDLE AVE

WYANDOTTE, MI 48192

This material has not been identified against a material Specification.

===== CHEMICAL AND PHYSICAL PROPERTIES =====

| | |
|------------------|-----------------------------|
| Material type | LIQUID |
| Color | PALE YELLOW |
| Specific Gravity | 1.210 |
| Boiling Point | +251 C |
| Flash Point | +135 C (Cleveland Open Cup) |
| pH | Not Applicable |

===== HAZARDOUS INGREDIENTS =====

| Percent Range | Exposure Limits - TWA ACGIH/OSHA (where est.) | CAS number | Chemical Name |
|---------------|--|---------------|----------------------------|
| >60 | 5 (S20) / 5 (S20) Ford= 2 ppb | +I+N 584-84-9 | * TOLUENE 2,4-DIISOCYANATE |
| >10-30 | None/None +I+N Ford= 2 ppb | 91-08-7 | + TOLUENE 2,6-DIISOCYANATE |

Exposure Limit Abbreviations

Carcinogen Listings

| | | | |
|---------------------------|-----------|--------|-------|
| TWA=Time Weighted Average | C=Ceiling | I=IARC | N=NTP |
| S=Short Term Exposure | Sk=Skin | | |
| Sol=Soluble Compounds | Fu=Fumes | | |
| Insol=Insoluble Compounds | Du=Dust | | |

* See chemical fact sheets (CFS) for additional details on these ingredients.
+ For more information on 91-08-7, see CFS for 584-84-9.

===== SIGNAL WORD =====

WARNING

===== HAZARDS =====

This product is harmful by inhalation.
This product is irritating to the eyes, respiratory system and skin.
This product may cause sensitization by inhalation and skin contact.
This material contains an ingredient which is a cancer hazard based on tests with laboratory animals. Overexposure may create a cancer risk.

===== SAFE HANDLING AND STORAGE =====

Use this product with adequate ventilation.
Do not get this material in your eyes, on your skin, or on your clothing.

===== PROTECTIVE MEASURES AND TREATMENTS =====

Use impervious gloves.

Wear chemical goggles.

If exhaust ventilation is needed, and not available, contact Corporate Industrial Hygiene for specific details.

In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.

Remove contaminated clothing and wash before reuse.

For skin contact, wash immediately with soap and water.

===== PREPARATION INFORMATION =====

The chemical identification and properties for this material were provided by the manufacturer. Health and safety information has been evaluated by:

Environmental & Occupational Toxicology, Occupational Health & Safety,
Ford Motor Company
900 Parklane Towers West, Dearborn, MI 48126

For emergency call: (313) 337-3182 -or- (313) 323-0045 (for 24 hour service)

Tox Status : C2

Print Date : 07/25/89

Product: T-422 MONDUR

Last Reviewed : 10/06/87

Supplier: MOBAY CHEMICAL CO
10 LINCOLN PKWY W
PITTSBURGH, PA 15205

(UCCS: M583F)

APPROVED to ACTIVE NAAO non-prod spec M98D8-A.

===== CHEMICAL AND PHYSICAL PROPERTIES =====

| | |
|------------------|------------------------|
| Material type | LIQUID |
| Color | AMBER |
| Specific Gravity | 1.230 |
| Boiling Point | +250 C |
| Flash Point | +135 C (Pensky-Marten) |
| pH | Not Applicable |

===== HAZARDOUS INGREDIENTS =====

| Percent Range | Exposure Limits - TWA ACGIH/OSHA (where est.) | CAS number | Chemical Name |
|---------------|--|--------------|--|
| >60 | 5 (S20) / 5 (S20) Ford= 2 ppb +I+N | 26471-62-5 + | TOLUENE DIISOCYANATE |
| >10-30 | None Established | 26447-40-5 | 1,1-METHYLENEBIS (ISOCYANATO-) BENZENE |

Exposure Limit Abbreviations

Carcinogen Listings

TWA=Time Weighted Average C=Ceiling I=IARC N=NTP
S=Short Term Exposure Sk=Skin
Sol=Soluble Compounds Fu=Fumes
Insol=Insoluble Compounds Du=Dust
+ For more information on 26471-62-5, see CFS for 584-84-9.

===== SIGNAL WORD =====

WARNING
DANGER -- POISON

===== HAZARDS =====

This product is harmful by inhalation.
This product is irritating to the respiratory system and skin.
This product may cause sensitization by inhalation and skin contact.
This material contains an ingredient which is a cancer hazard based on tests with laboratory animals. Overexposure may create a cancer risk.
This product may cause severe eye irritation.

===== SAFE HANDLING AND STORAGE =====

Do not breathe gas/fumes/vapor/spray.
Use this product with adequate ventilation.
Do not get this material in your eyes, on your skin, or on your clothing.

===== PROTECTIVE MEASURES AND TREATMENTS =====

Use impervious gloves.

Wear chemical goggles.

If exhaust ventilation is needed, and not available, contact Corporate Industrial Hygiene for specific details.

In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.

Remove contaminated clothing and wash before reuse.

If gas/fume/vapor/dust/mist from the material is inhaled, remove the affected person immediately to fresh air.

For skin contact, wash immediately with soap and water.

===== NOTES TO PHYSICIANS =====

If the affected person is not breathing, apply artificial respiration.

If the affected person's breathing is difficult, give oxygen.

===== SPECIAL REMARKS =====

Contamination with water may cause hazardous polymerization.

===== U. S. DEPARTMENT OF TRANSPORTATION INFORMATION =====

Shipping name: TOLUENE DIISOCYANATE UN: 2078

Hazard Class: Poison B

Hazard Label: Poison

The chemical name(s) appearing below under "NAME" must appear as part of shipping name IF the amount being shipped in each container exceeds the quantity shown under "RQ" below. The letters "RQ" must also appear as part of the shipping name, in the form:

shipping name, chemical name, RQ.

For U.S. shipments from Ford Facilities, consult the "Ford Hazardous Material Transportation Control Program" Manual, otherwise consult 49CFR172.

-----CAS-- RQ(lbs) -NAME-----

26471-62-5 125 TOLUENE DIISOCYANATE

===== PREPARATION INFORMATION =====

The chemical identification and properties for this material were provided by the manufacturer. Health and safety information has been evaluated by:

Environmental & Occupational Toxicology, Occupational Health & Safety,
Ford Motor Company
900 Parklane Towers West, Dearborn, MI 48126

For emergency call: (313) 337-3182 -or- (313) 323-0045 (for 24 hour service)

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes 1
 No 2

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI
☐

| Activity | Physical State | | | | |
|-------------|----------------|--------|----------|---------------|-----|
| | Solid | Slurry | Liquid | Liquified Gas | Gas |
| Manufacture | 1 | 2 | 3 | 4 | 5 |
| Import | 1 | 2 | 3 | 4 | 5 |
| Process | 1 | 2 | <u>3</u> | 4 | 5 |
| Store | 1 | 2 | <u>3</u> | 4 | 5 |
| Dispose | <u>1</u> | 2 | <u>3</u> | 4 | 5 |
| Transport | 1 | 2 | <u>3</u> | 4 | 5 |

☐ Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles ≥ 10 microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

☐

| <u>Physical State</u> | | <u>Manufacture</u> | <u>Import</u> | <u>Process</u> | <u>Store</u> | <u>Dispose</u> | <u>Transport</u> |
|-----------------------|------------------|--------------------|---------------|----------------|--------------|----------------|------------------|
| Dust | <1 micron | N/A | | | | | |
| | 1 to <5 microns | | | | | | |
| | 5 to <10 microns | | | | | | |
| Powder | <1 micron | | | | | | |
| | 1 to <5 microns | | | | | | |
| | 5 to <10 microns | | | | | | |
| Fiber | <1 micron | | | | | | |
| | 1 to <5 microns | | | | | | |
| | 5 to <10 microns | | | | | | |
| Aerosol | <1 micron | | | | | | |
| | 1 to <5 microns | | | | | | |
| | 5 to <10 microns | | | | | | |

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 5 ENVIRONMENTAL FATE

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) unknown (1/M cm) at _____ nm

Reaction quantum yield, ϕ unknown at _____ nm

Direct photolysis rate constant, k_p , at ... unknown 1/hr _____ latitude

b. Oxidation constants at 25°C:

For 1O_2 (singlet oxygen), k_{ox} unknown 1/M hr

For RO_2 (peroxy radical), k_{ox} unknown 1/M hr

c. Five-day biochemical oxygen demand, BOD_5 ... unknown mg/l

d. Biotransformation rate constant:

For bacterial transformation in water, k_b ... unknown 1/hr

Specify culture unknown

e. Hydrolysis rate constants:

For base-promoted process, k_B unknown 1/M hr

For acid-promoted process, k_A unknown 1/M hr

For neutral process, k_N unknown 1/hr

f. Chemical reduction rate (specify conditions) unknown

g. Other (such as spontaneous degradation) ... unknown

☐ Mark (X) this box if you attach a continuation sheet.

PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

| <u>Media</u> | <u>Half-life (specify units)</u> |
|---------------|----------------------------------|
| Groundwater | <u>Unknown</u> |
| Atmosphere | <u>Unknown</u> |
| Surface water | <u>Unknown</u> |
| Soil | <u>Unknown</u> |

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

| <u>CAS No.</u> | <u>Name</u> | <u>Half-life (specify units)</u> | <u>Media</u> |
|-----------------------------|-----------------------------|----------------------------------|--------------------------------|
| <u> </u> | <u> </u> | <u> </u> | in <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | in <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | in <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | in <u> </u> |

5.03 Specify the octanol-water partition coefficient, K_{ow} ... Unknown at 25°C
Method of calculation or determination

5.04 Specify the soil-water partition coefficient, K_d Unknown at 25°C
Soil type

5.05 Specify the organic carbon-water partition coefficient, K_{oc} Unknown at 25°C

5.06 Specify the Henry's Law Constant, H Unknown atm-m³/mole

☐ Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

| <u>Bioconcentration Factor</u> | <u>Species</u> | <u>Test</u> ¹ |
|--------------------------------|----------------|--------------------------|
| Unknown | | |
| | | |
| | | |

¹Use the following codes to designate the type of test:

F = Flowthrough
S = Static

☐ Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of
CBI the listed substance sold or transferred in bulk during the reporting year.

☐

N/A

| <u>Market</u> | <u>Quantity Sold or Transferred (kg/yr)</u> | <u>Total Sales Value (\$/yr)</u> |
|---|---|--------------------------------------|
| Retail sales | _____ | _____ |
| Distribution -- Wholesalers | _____ | _____ |
| Distribution -- Retailers | _____ | _____ |
| Intra-company transfer | _____ | _____ |
| Repackagers | _____ | _____ |
| Mixture producers | _____ | _____ |
| Article producers | _____ | _____ |
| Other chemical manufacturers or processors | _____ | _____ |
| Exporters | _____ | _____ |
| Other (specify) _____ | _____ | _____ |

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist
for the listed substance and state the cost of each substitute. A commercially
feasible substitute is one which is economically and technologically feasible to use
CBI in your current operation, and which results in a final product with comparable
performance in its end uses.

☐

| <u>Substitute</u> | <u>Cost (\$/kg)</u> |
|-------------------------|---------------------|
| None known at this time | _____ |
| _____ | _____ |
| _____ | _____ |

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

General Instructions:

For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

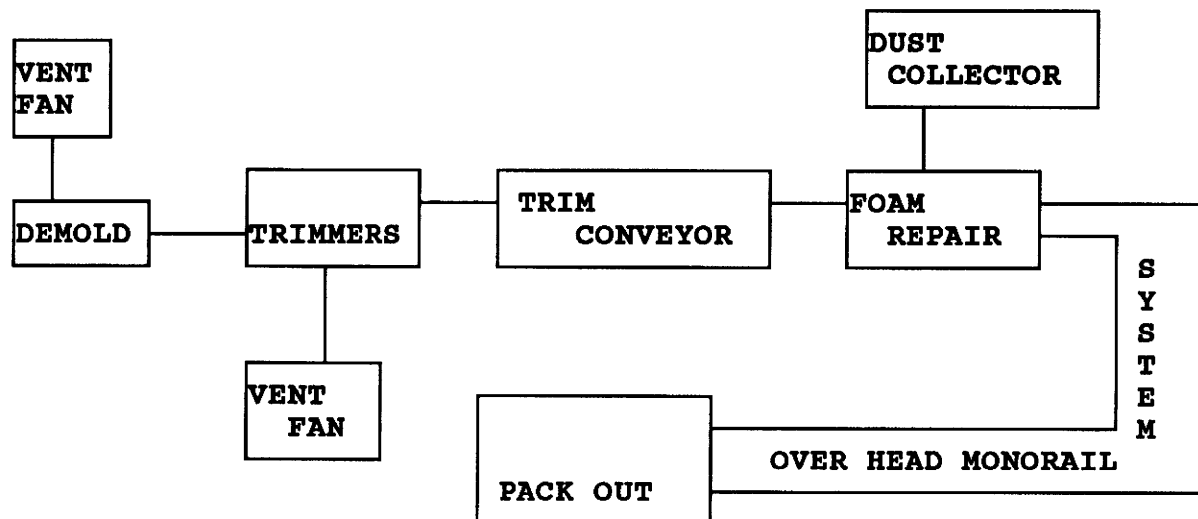
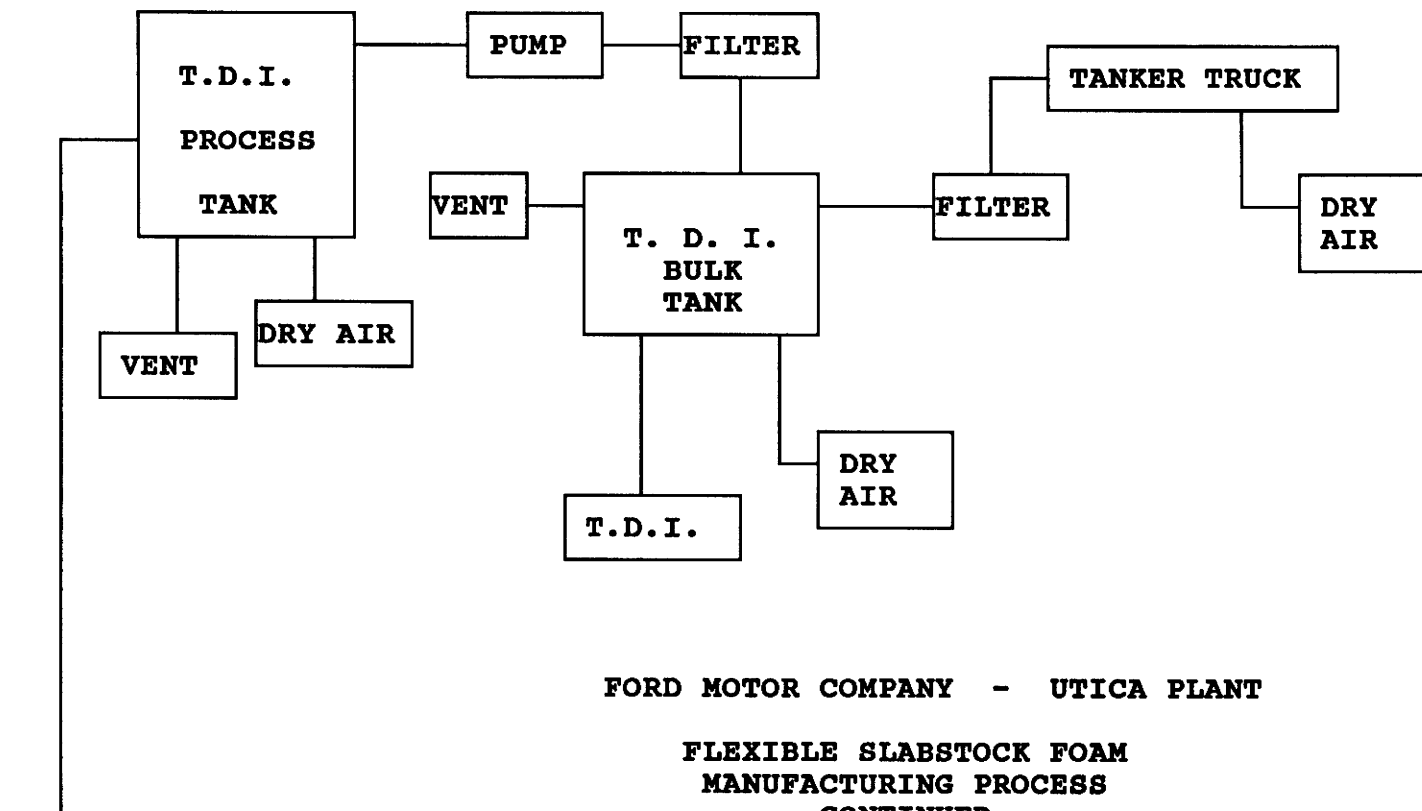
PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

7.01 In accordance with the instructions, provide a process block flow diagram showing the major (greatest volume) process type involving the listed substance.

CBI

☐ Process type Flexible slabstock foam manufacturing process

☒ Mark (X) this box if you attach a continuation sheet.

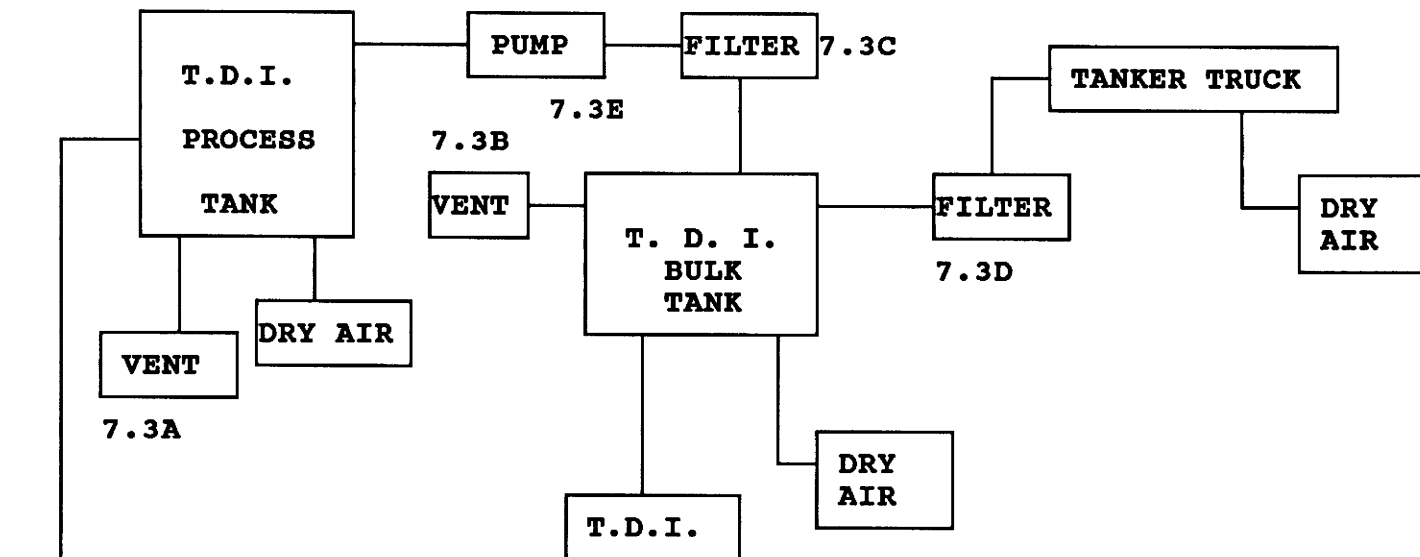


7.03 In accordance with the instructions, provide a process block flow diagram showing all process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if not treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

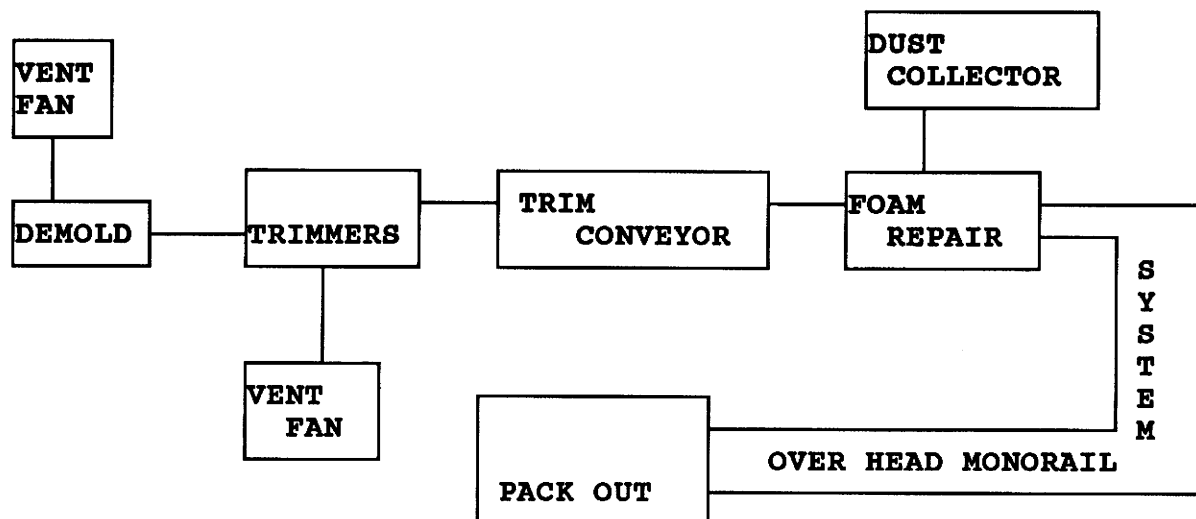
☐ Process type Flexible slabstock foam manufacturing process

☒ Mark (X) this box if you attach a continuation sheet.



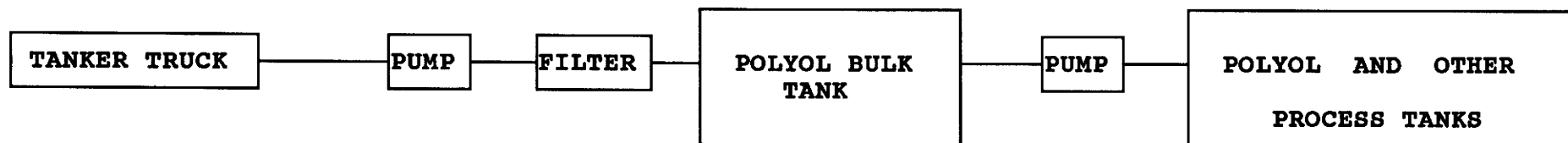
FORD MOTOR COMPANY - UTICA PLANT

FLEXIBLE SLABSTOCK FOAM
MANUFACTURING PROCESS
CONTINUED



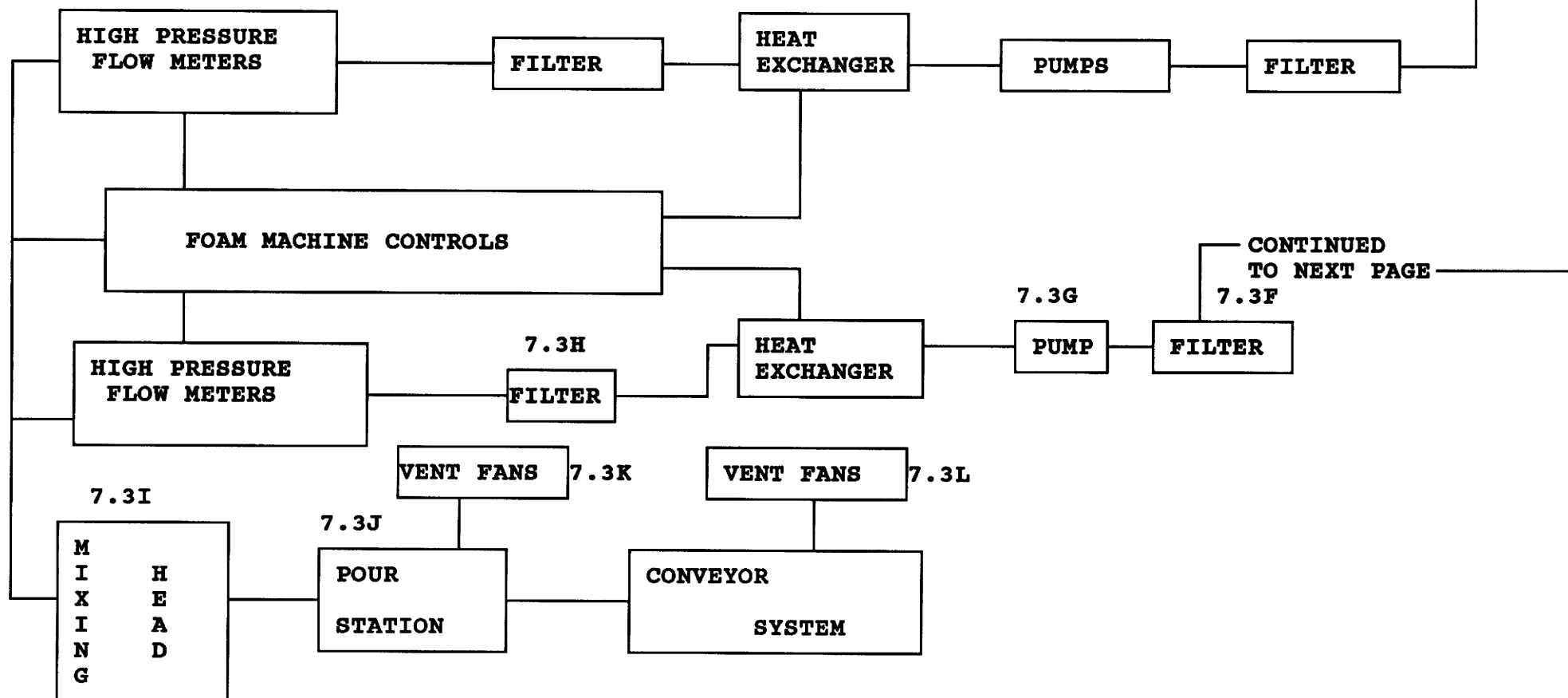
T.D.I. EMISSIONS

-
- 7.3A - T.D.I. DAY TANK VENT
 - 7.3B - T.D.I. BULK TANK VENT
 - 7.3C - T.D.I. BULK TANK FILTER
 - 7.3D - T.D.I. FILL LINE FILTER
 - 7.3E - T.D.I. BULK TANK PUMP SEAL
 - 7.3F - T.D.I. LINE FILTER
 - 7.3G - T.D.I. LINE PUMP SEAL
 - 7.3H - T.D.I. FINAL FILTER
 - 7.3I - T.D.I. POUR HEAD
 - 7.3J - T.D.I. POUR HEAD FLUSHING
 - 7.3K - T.D.I. POUR ROOM VENT
 - 7.3L - T.D.I. CONVEYOR & OVEN VENTS



FORD MOTOR COMPANY - UTICA PLANT
FLEXIBLE SLABSTOCK MANUFACTURING
PROCESS

POLYOL —
TIN CATALYST —
AMINE CATALYST —
SILICONE SUR. —
WATER —
ADDITIVES —
BLOWING AGENT —



7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manufacturing process

| <u>Unit Operation ID Number</u> | <u>Typical Equipment Type</u> | <u>Operating Temperature Range (°C)</u> | <u>Operating Pressure Range (mm Hg)</u> | <u>Vessel Composition</u> |
|---|---------------------------------------|---|---|-------------------------------|
| <u>7.3A</u> | <u>Vent-Day tank</u> | <u>18-26</u> | <u>UK</u> | <u>Steel</u> |
| <u>7.3B</u> | <u>Vent-Bulk tank</u> | <u>18-26</u> | <u>UK</u> | <u>Steel</u> |
| <u>7.3C</u> | <u>Filter-Bulk tank</u> | <u>18-26</u> | <u>3620-3800</u> | <u>Steel</u> |
| <u>7.3D</u> | <u>Filter -Fill line</u> | <u>18-26</u> | <u>3620-3800</u> | <u>Steel</u> |
| <u>7.3E</u> | <u>Bulk tank Pump seal</u> | <u>18-26</u> | <u>3620-3800</u> | <u>Steel</u> |
| <u>7.3F</u> | <u>Filter -Line</u> | <u>18-26</u> | <u>3620-3800</u> | <u>Steel</u> |
| <u>7.3G</u> | <u>Pump seal-Line</u> | <u>18-26</u> | <u>3620-3800</u> | <u>Steel</u> |
| <u>7.3H</u> | <u>Filter -Final</u> | <u>18-26</u> | <u>3620-3800</u> | <u>Steel</u> |
| <u>7.3I</u> | <u>Pour head</u> | <u>18-26</u> | <u>UK</u> | <u>Steel</u> |
| <u>7.3J</u> | <u>Pour head-Flushing</u> | <u>18-26</u> | <u>UK</u> | <u>Steel</u> |

☒ Mark (X) this box if you attach a continuation sheet.

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manuf. process

| <u>Unit Operation ID Number</u> | <u>Typical Equipment Type</u> | <u>Operating Temperature Range (°C)</u> | <u>Operating Pressure Range (mm Hg)</u> | <u>Vessel Composition</u> |
|---|---------------------------------------|---|---|-------------------------------|
| <u>7.3K</u> | <u>Vent-Pour room</u> | <u>18-24</u> | <u>UK</u> | <u>Steel</u> |
| <u>7.3L</u> | <u>Conveyor and oven</u> | <u>18-24</u> | <u>UK</u> | <u>Steel</u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type FlexABLE SLABSTOCK FOAM MANUFACTURING PROCESS

| <u>Process Stream ID Code</u> | <u>Process Stream Description</u> | <u>Physical State¹</u> | <u>Stream Flow (kg/yr)</u> |
|---|---------------------------------------|-----------------------------------|--------------------------------|
| <u>7.1</u> | <u>Tank truck with polyol</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.2</u> | <u>Polyol bulk pump</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.3</u> | <u>Polyol bulk filter</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.4</u> | <u>Polyol bulk tank</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.5</u> | <u>Polyol transfer pump</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.6</u> | <u>Polyol day tank</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.7</u> | <u>Polyol day tank filter</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.8</u> | <u>Polyol pump</u> | <u>OL</u> | <u>N/A</u> |

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☒ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manufact. process

| <u>Process Stream ID Code</u> | <u>Process Stream Description</u> | <u>Physical State¹</u> | <u>Stream Flow (kg/yr)</u> |
|---|---------------------------------------|-----------------------------------|--------------------------------|
| <u>7.9</u> | <u>Polyol heat exchanger</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.10</u> | <u>Polyol line filter</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.11</u> | <u>Polyol metering</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.12</u> | <u>TDI dry air blanket</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.13</u> | <u>TDI tanker truck</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.14</u> | <u>TDI bulk filter</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.15</u> | <u>TDI bulk tank</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.16</u> | <u>TDI bulk tank filter</u> | <u>OL</u> | <u>N/A</u> |

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
GU = Gas (uncondensable at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☒ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type FlexABLE SLABSTOCK FOAM MANUFACTURING PROCESS

| <u>Process Stream ID Code</u> | <u>Process Stream Description</u> | <u>Physical State¹</u> | <u>Stream Flow (kg/yr)</u> |
|---|---------------------------------------|-----------------------------------|--------------------------------|
| <u>7.17</u> | <u>TDI bulk tank vent</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.18</u> | <u>TDI line pump</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.19</u> | <u>TDI process day tanks</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.20</u> | <u>TDI dry air blanket</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.21</u> | <u>TDI day tank vents</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.22</u> | <u>TDI day tank filter</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.23</u> | <u>TDI day tank pump</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.24</u> | <u>TDI heat exchanger</u> | <u>OL</u> | <u>N/A</u> |

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
GU = Gas (uncondensable at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☒ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manufacturing process

| <u>Process Stream ID Code</u> | <u>Process Stream Description</u> | <u>Physical State¹</u> | <u>Stream Flow (kg/yr)</u> |
|---|---------------------------------------|-----------------------------------|--------------------------------|
| <u>7.25</u> | <u>Foam machine</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.26</u> | <u>TDI final filter</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.27</u> | <u>TDI metering</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.28</u> | <u>Foam head</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.29</u> | <u>Pour station</u> | <u>OL</u> | <u>N/A</u> |
| <u>7.30</u> | <u>Pour station vent</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.31</u> | <u>Conveyor & ovens</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.32</u> | <u>Conveyor & oven vents</u> | <u>GU</u> | <u>N/A</u> |

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☒ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

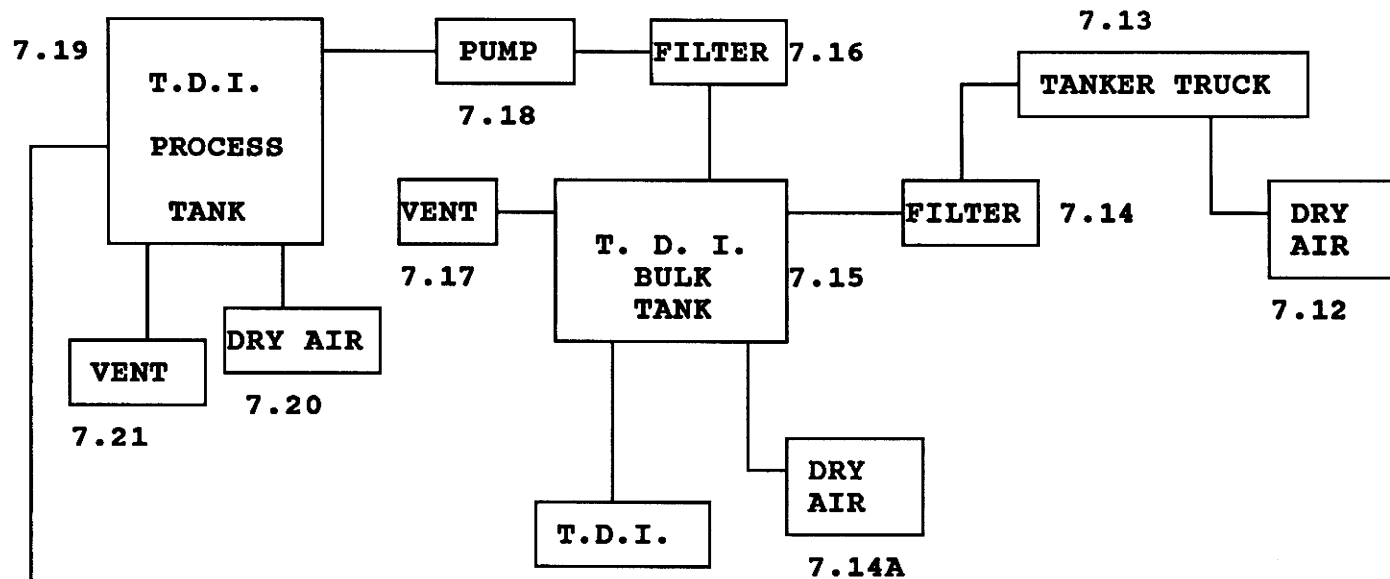
☐ Process type Flexible slabstock foam manufacturing process

| Process Stream ID Code | Process Stream Description | Physical State ¹ | Stream Flow (kg/yr) |
|---------------------------------|-------------------------------|-----------------------------|------------------------|
| <u>7.33</u> | <u>Demold vents</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.34</u> | <u>Demolding</u> | <u>SO</u> | <u>N/A</u> |
| <u>7.35</u> | <u>Part trimming</u> | <u>SO</u> | <u>N/A</u> |
| <u>7.36</u> | <u>Area ventilation</u> | <u>GU</u> | <u>N/A</u> |
| <u>7.37</u> | <u>Trim conveyor</u> | <u>SO</u> | <u>N/A</u> |
| <u>7.38</u> | <u>Foam repair</u> | <u>SO</u> | <u>N/A</u> |
| <u>7.39</u> | <u>Particulate collector</u> | <u>SO</u> | <u>N/A</u> |
| <u>7.40</u> | <u>Part packout</u> | <u>SO</u> | <u>N/A</u> |

¹Use the following codes to designate the physical state for each process stream:

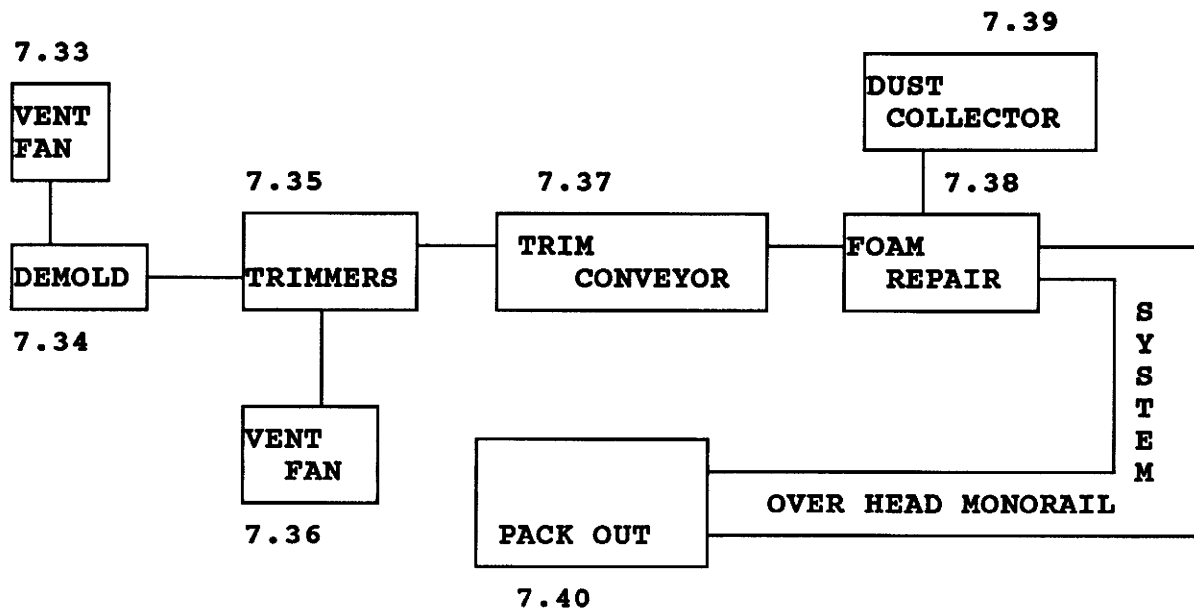
GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

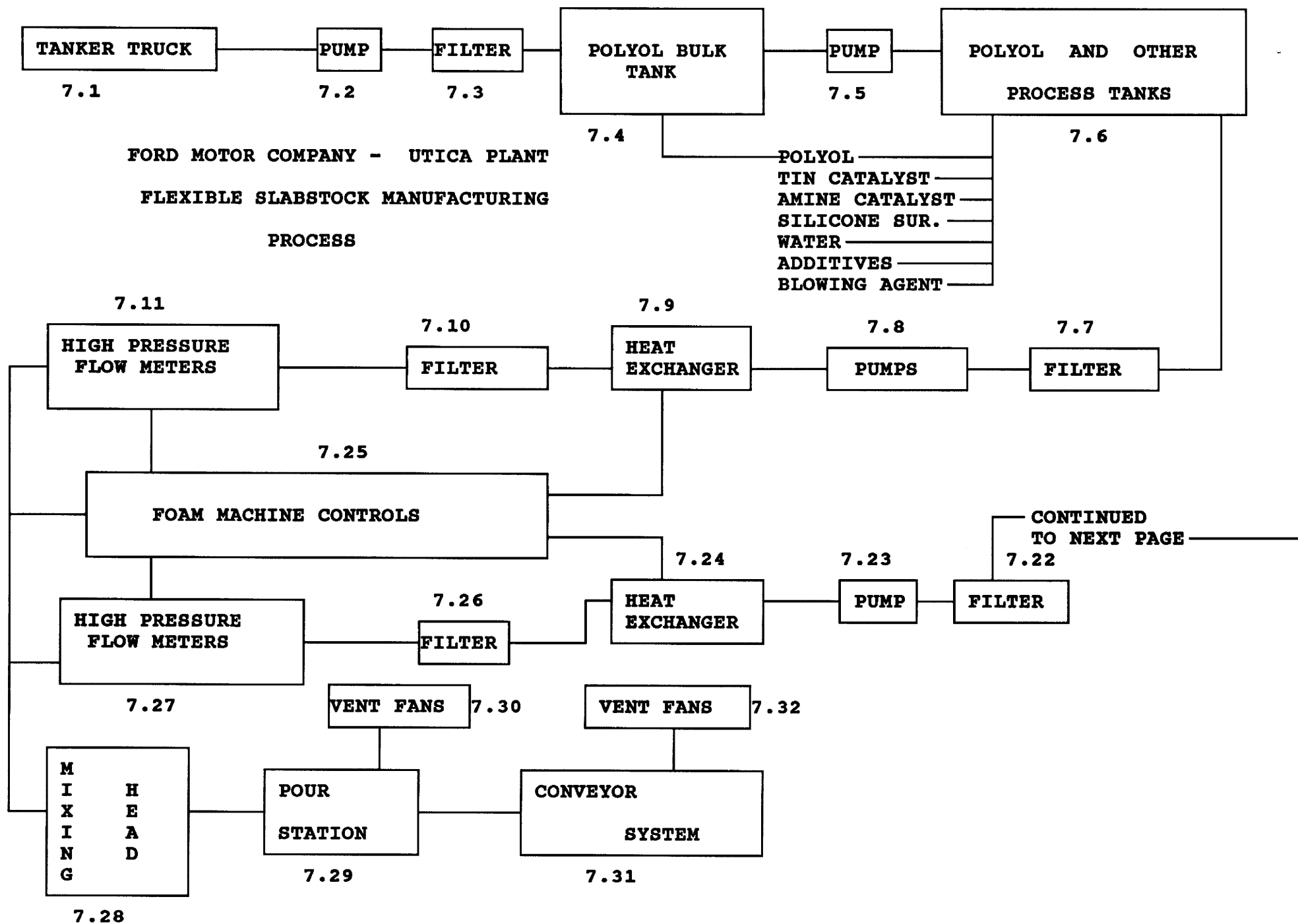
☒ Mark (X) this box if you attach a continuation sheet.



FORD MOTOR COMPANY - UTICA PLANT

FLEXIBLE SLABSTOCK FOAM
MANUFACTURING PROCESS
CONTINUED





7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type Flexible slabstock foam manufacturing process

| a. | b. | c. | d. | e. |
|------------------------|------------------------------|--|--------------------------|-------------------------------------|
| Process Stream ID Code | Known Compounds ¹ | Concentrations ^{2,3} (% or ppm) | Other Expected Compounds | Estimated Concentrations (% or ppm) |
| 7.2 | Polyol, additives | 100 | N/A | N/A |
| | Tin catalyst | | | |
| | Amine catalyst | | | |
| | Silicone, water | | | |
| 7.14 | TDI | 99.9 | Hydrolyzable chloride | 0.1% |
| | | | | |
| | | | | |
| | | | | |
| 7.28 | Polyol, TDI, Tin, | 100 | N/A | N/A |
| | Water, Amine, | | | |
| | Silicone | | | |
| | | | | |

7.06 continued below

☒ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type Flexible slabstock foam manufacturing process

| a. | b. | c. | d. | e. |
|------------------------------|------------------------------|--|--------------------------------|---|
| Process Stream ID Code | Known Compounds ¹ | Concen- trations ^{2,3} (% or ppm) | Other Expected Compounds | Estimated Concentrations (% or ppm) |
| 7.29 | Polyurethane | 100 | N/A | N/A |
| | Foam | | | |
| | | | | |
| | | | | |
| 7.30 | TDI | .005% | Air | 99.995% |
| | Methylene chloride | 1% | Air | 99% |
| | blowing agent | 2% | Air | 98% |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

7.06 (continued)

¹For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

| Additive Package Number | Components of Additive Package | Concentrations (% or ppm) |
|----------------------------|-----------------------------------|------------------------------|
| 1 | N/A | |
| | | |
| | | |
| 2 | | |
| | | |
| | | |
| 3 | | |
| | | |
| | | |
| 4 | | |
| | | |
| | | |
| 5 | | |
| | | |
| | | |

²Use the following codes to designate how the concentration was determined:

A = Analytical result
E = Engineering judgement/calculation

³Use the following codes to designate how the concentration was measured:

V = Volume
W = Weight

☐ Mark (X) this box if you attach a continuation sheet.

PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.01.

CBI

☐ Process type Flexible slabstock foam manufacturing process

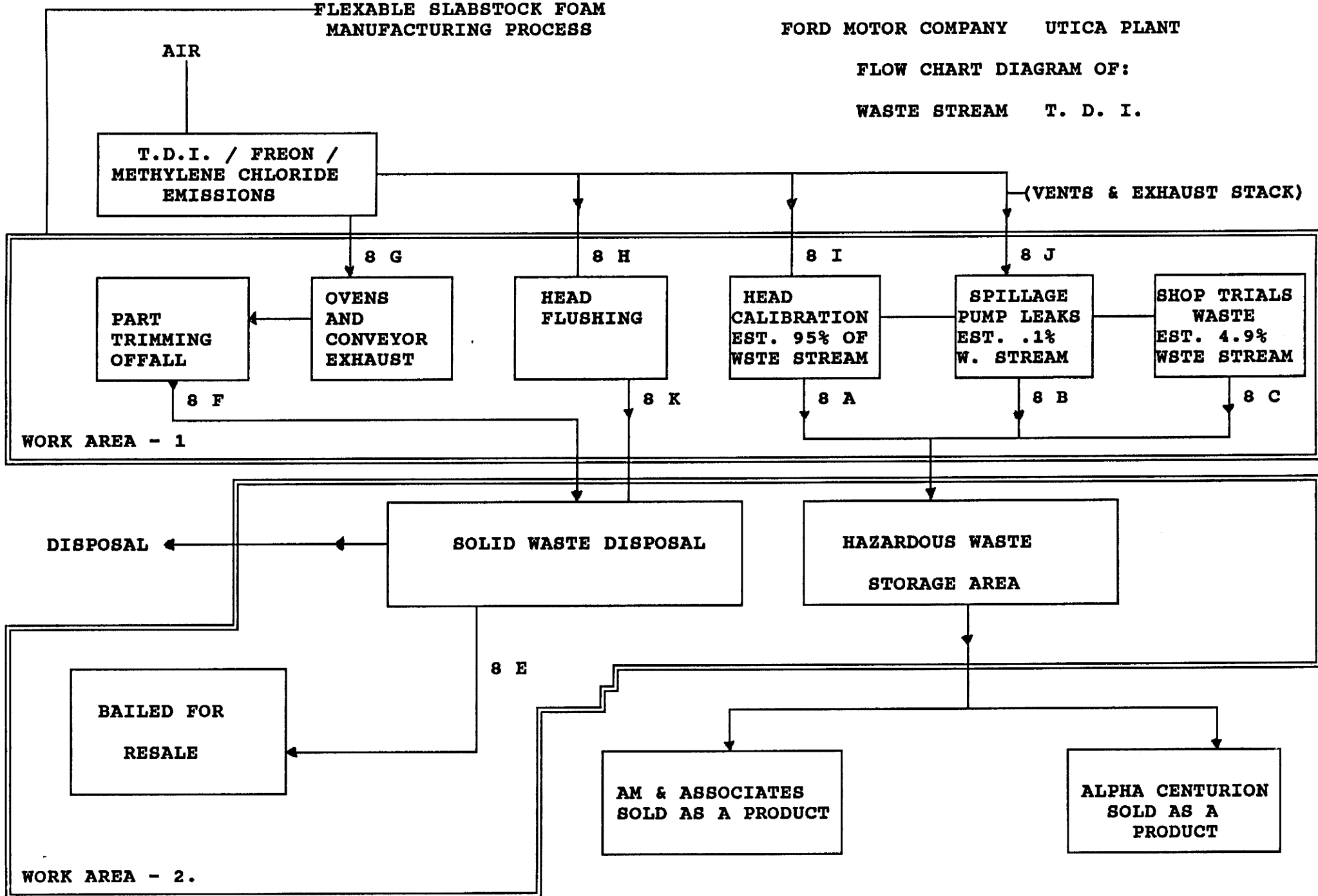
☒ Mark (X) this box if you attach a continuation sheet.

**FLEXABLE SLABSTOCK FOAM
MANUFACTURING PROCESS**

FORD MOTOR COMPANY UTICA PLANT

FLOW CHART DIAGRAM OF:

WASTE STREAM T. D. I.



PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

☐ Process type Flexible slabstock foam manufacturing process

| a. | b. | c. | d. | e. | f. | g. |
|----------------|--------------------------------------|---|------------------------------|--|--------------------------|-------------------------------------|
| Stream ID Code | Type of Hazardous Waste ¹ | Physical State of Residual ² | Known Compounds ³ | Concentrations (% or ppm) ^{4,5,6} | Other Expected Compounds | Estimated Concentrations (% or ppm) |
| 8a | T, R | GU | Meth. Chlor. | UK | UK | UK |
| | | GU | Freon | UK | UK | UK |
| | | GU | TDI | UK | UK | UK |
| 8b | R | OL | TDI | UK | UK | UK |
| | | | | | | |
| | | | | | | |
| 8g | T, R | GU | Meth. Chlor. | UK | UK | UK |
| | | GU | Freon | UK | UK | UK |
| | | GU | TDI | UK | UK | UK |
| 8h | T, R | GU | TDI | UK | UK | UK |
| | | GU | Freon | UK | UK | UK |
| | | GU | Meth. Chlor. | UK | UK | UK |

8.05 continued below

☒ Mark (X) this box if you attach a continuation sheet.

PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

☐ Process type Flexible slabstock foam manufacturing process

| a. | b. | c. | d. | e. | f. | g. |
|----------------|--------------------------------------|---|------------------------------|--|--------------------------|-------------------------------------|
| Stream ID Code | Type of Hazardous Waste ¹ | Physical State of Residual ² | Known Compounds ³ | Concentrations (% or ppm) ^{4,5,6} | Other Expected Compounds | Estimated Concentrations (% or ppm) |
| 8I | T | GU | Meth. Chlor. | UK | UK | UK |
| | | GU | Freon | UK | UK | UK |
| | | | | | | |
| 8J | T | GU | TDI | UK | UK | UK |
| | | GU | Meth. Chlor. | UK | UK | UK |
| | | | | | | |
| 8k | T | GU | Meth. Chlor. | UK | UK | UK |
| | | SO | Polyurethane | UK | UK | UK |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

¹Use the following codes to designate the type of hazardous waste:

I = Ignitable
C = Corrosive
R = Reactive
E = EP toxic
T = Toxic
H = Acutely hazardous

²Use the following codes to designate the physical state of the residual:

GC = Gas (condensable at ambient temperature and pressure)
GU = Gas (uncondensable at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

³For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

| Additive Package Number | Components of Additive Package | Concentrations (% or ppm) |
|----------------------------|-----------------------------------|------------------------------|
| <u>1</u> | <u>N/A</u> | <u></u> |
| | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| <u>2</u> | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| <u>3</u> | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| <u>4</u> | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| <u>5</u> | <u></u> | <u></u> |
| | <u></u> | <u></u> |
| | <u></u> | <u></u> |

⁴Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

⁵Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

⁶Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

| <u>Code</u> | <u>Method</u> | <u>Detection Limit</u> <u>(± ug/l)</u> |
|-------------|---------------|---|
| <u>1</u> | N/A | |
| <u>2</u> | | |
| <u>3</u> | | |
| <u>4</u> | | |
| <u>5</u> | | |
| <u>6</u> | | |

☐ Mark (X) this box if you attach a continuation sheet.

8.06 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type Flexible slabstock foam manufacturing process

| a. | b. | c. | d. | e. | | f. | g. |
|----------------|-------------------------------------|-------------------------------------|-----------------------------|----------------------------|------------|--|-------------------------------|
| Stream ID Code | Waste Description Code ¹ | Management Method Code ² | Residual Quantities (kg/yr) | Management of Residual (%) | | Costs for Off-Site Management (per kg) | Changes in Management Methods |
| | | | | On-Site | Off-Site | | |
| <u>8a</u> | <u>B69</u> | <u>1A (s)</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | <u>1 ST (s)</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | <u>2 TR</u> | <u>UK</u> | | <u>100</u> | <u>Sold</u> | <u>None</u> |
| <u>8b</u> | <u>B69</u> | <u>1A (s)</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | <u>1 ST (s)</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | <u>2 TR</u> | <u>UK</u> | | <u>100</u> | <u>Sold</u> | <u>None</u> |
| <u>8c</u> | <u>B69</u> | <u>1A (s)</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | <u>1 ST (s)</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | <u>2 TR</u> | <u>UK</u> | | <u>100</u> | <u>Sold</u> | <u>None</u> |
| <u>8g</u> | <u>B61</u> | <u>M5a</u> | <u>UK</u> | <u>100</u> | | <u>N/A</u> | <u>None</u> |
| | | | | | | | |
| | | | | | | | |

¹Use the codes provided in Exhibit 8-1 to designate the waste descriptions

²Use the codes provided in Exhibit 8-2 to designate the management methods

☒ Mark (X) this box if you attach a continuation sheet.

8.06 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type Flexible slabstock foam manufacturing process

| a. | b. | c. | d. | e. | | f. | g. |
|----------------|-------------------------------------|-------------------------------------|-----------------------------|----------------------------|----------|--|-------------------------------|
| Stream ID Code | Waste Description Code ¹ | Management Method Code ² | Residual Quantities (kg/yr) | Management of Residual (%) | | Costs for Off-Site Management (per kg) | Changes in Management Methods |
| | | | | On-Site | Off-Site | | |
| 8H | B61 | M5a | UK | 100 | | N/A | None |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| 8K | B82 | M5a (s) | UK | 100 | | N/A | None |
| | | 1D | UK | | 100 | UK | None |
| | | | | | | | |
| | | | | | | | |
| 8I | B61 | M5a | UK | 100 | | N/A | None |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| 8J | B61 | M5a | UK | 100 | | N/A | None |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

¹Use the codes provided in Exhibit 8-1 to designate the waste descriptions

²Use the codes provided in Exhibit 8-2 to designate the management methods

☐ Mark (X) this box if you attach a continuation sheet.

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐ N/A

| Incinerator | Combustion Chamber Temperature (°C) | | Location of Temperature Monitor | | Residence Time In Combustion Chamber (seconds) | |
|-------------|-------------------------------------|-----------|---------------------------------|-----------|--|-----------|
| | Primary | Secondary | Primary | Secondary | Primary | Secondary |
| 1 | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1
No 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

| Incinerator | Air Pollution Control Device ¹ | Types of Emissions Data Available |
|-------------|---|-----------------------------------|
| 1 | N/A | |
| 2 | | |
| 3 | | |

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1
No 2

¹Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)
E = Electrostatic precipitator
O = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

CBI

☐

| <u>Data Element</u> | <u>Data are Maintained for:</u> | | <u>Year in Which</u> | <u>Number of</u> |
|---|---------------------------------|-----------------|------------------------|-----------------------|
| | <u>Hourly</u> | <u>Salaried</u> | <u>Data Collection</u> | <u>Years Records</u> |
| | <u>Workers</u> | <u>Workers</u> | <u>Began</u> | <u>Are Maintained</u> |
| Date of hire | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Age at hire | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Work history of individual before employment at your facility | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| Sex | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Race | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Job titles | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Start date for each job title | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| End date for each job title | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Work area industrial hygiene monitoring data | <u>X</u> | <u>X</u> | <u>1970</u> | <u>Indefinite</u> |
| Personal employee monitoring data | <u>X</u> | <u>X</u> | <u>1972</u> | <u>E</u> |
| Employee medical history | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Employee smoking history | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| Accident history | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Retirement date | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Termination date | <u>X</u> | <u>X</u> | <u>Date of hire</u> | <u>E</u> |
| Vital status of retirees | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| Cause of death data | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |

☐ Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

| a. | b. | c. | d. | e. |
|-------------------------------------|-------------------------|-----------------------------|----------------------|---------------------------|
| <u>Activity</u> | <u>Process Category</u> | <u>Yearly Quantity (kg)</u> | <u>Total Workers</u> | <u>Total Worker-Hours</u> |
| Manufacture of the listed substance | Enclosed | <u>N/A</u> | <u> </u> | <u> </u> |
| | Controlled Release | <u>N/A</u> | <u> </u> | <u> </u> |
| | Open | <u>N/A</u> | <u> </u> | <u> </u> |
| On-site use as reactant | Enclosed | <u>N/A</u> | <u> </u> | <u> </u> |
| | Controlled Release | <u>4,040,613</u> | <u>75</u> | <u>160,650</u> |
| | Open | <u>N/A</u> | <u> </u> | <u> </u> |
| On-site use as nonreactant | Enclosed | <u>N/A</u> | <u> </u> | <u> </u> |
| | Controlled Release | <u>N/A</u> | <u> </u> | <u> </u> |
| | Open | <u>N/A</u> | <u> </u> | <u> </u> |
| On-site preparation of products | Enclosed | <u>N/A</u> | <u> </u> | <u> </u> |
| | Controlled Release | <u>N/A</u> | <u> </u> | <u> </u> |
| | Open | <u>N/A</u> | <u> </u> | <u> </u> |

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Set-up foam employees

B

Bulk storage employees

C

Pipe fitters changing lines

D

General cleaners

E

Millwright laborers

F

Supervisor

G

H

I

J

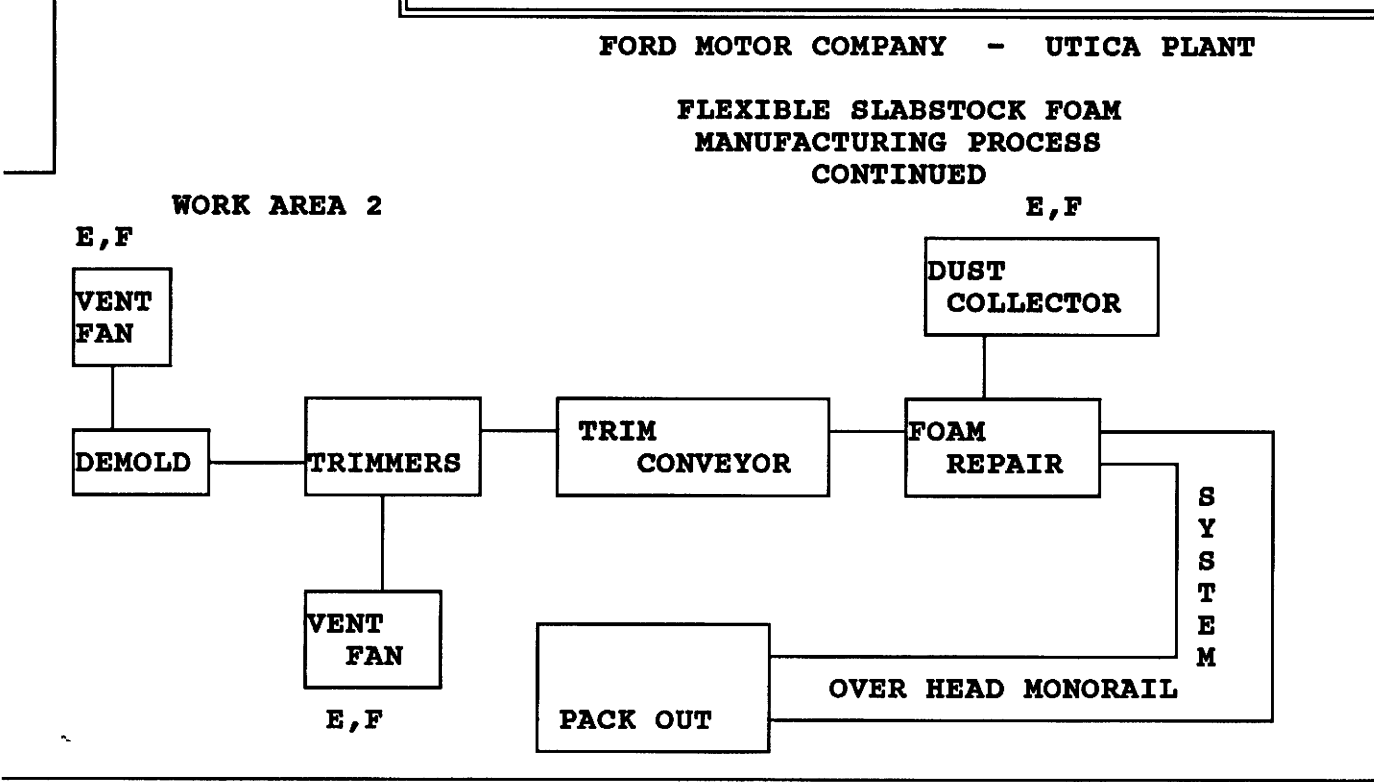
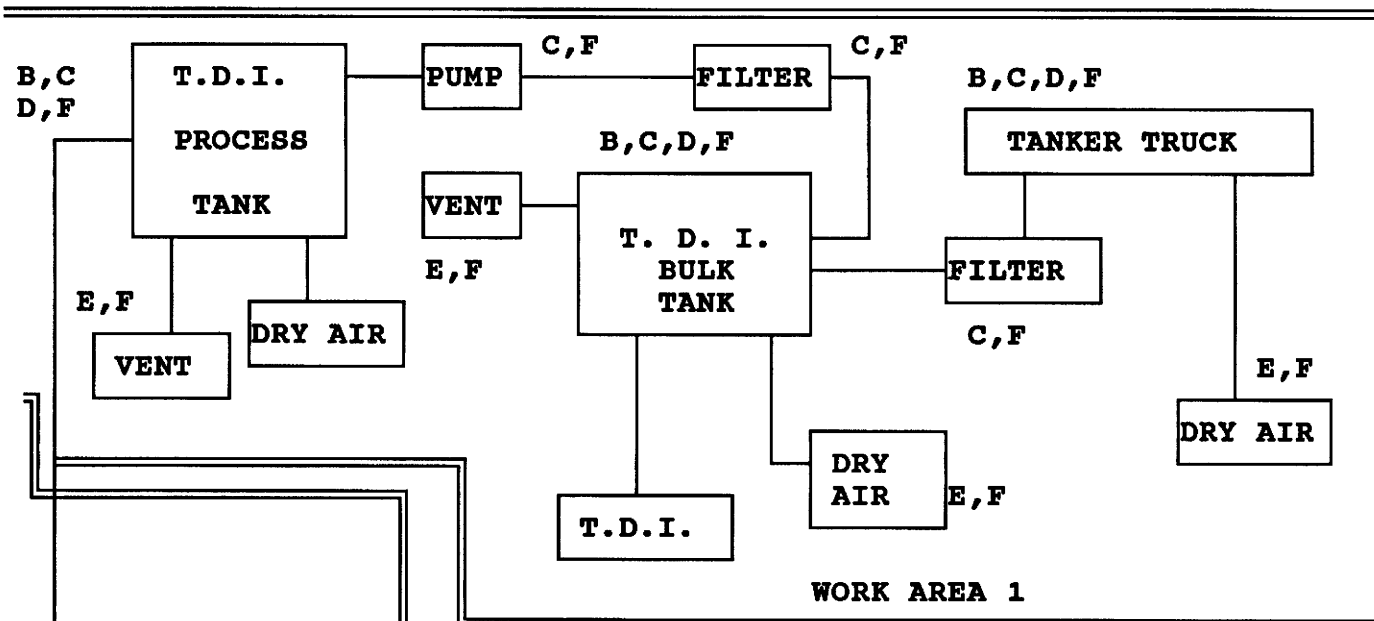
☐ Mark (X) this box if you attach a continuation sheet.

9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

CBI

☐ Process type Flexible slab stock foam manufacturing process

☒ Mark (X) this box if you attach a continuation sheet.



9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manufacturing process

Work Area ID

Description of Work Areas and Worker Activities

| | |
|----|---|
| 1 | <u>B, C, D, E, F (All worker activities of each group)</u> |
| 2 | <u>A, B, C, D, E, F (All worker activities of each group)</u> |
| 3 | <u> </u> |
| 4 | <u> </u> |
| 5 | <u> </u> |
| 6 | <u> </u> |
| 7 | <u> </u> |
| 8 | <u> </u> |
| 9 | <u> </u> |
| 10 | <u> </u> |

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☐ Process type Flexible slabstock foam manuf. process

Work area

| Labor Category | Number of Workers Exposed | Mode of Exposure (e.g., direct skin contact) | Physical State of Listed Substance ¹ | Average Length of Exposure Per Day ² | Number of Days per Year Exposed |
|----------------|---------------------------|--|---|---|---------------------------------|
| A | 6 | Inhalation and skin contact | OL & GU | B | 263 |
| B | 5 | Inhalation and skin contact | OL & GU | C | 263 |
| C | 28 | Inhalation and skin contact | OL & GU | E | 300 |
| D | 60 | Inhalation and skin contact | OL & GU | D | 365 |
| E | 22 | Inhalation | GU | A | 365 |
| F | 6 | Inhalation | GU | A | 365 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensible at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)
 SO = Solid

SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less
 B = Greater than 15 minutes, but not exceeding 1 hour
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours
 E = Greater than 4 hours, but not exceeding 8 hours
 F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Flexible slab stock foam manuf. process

Work area Foam lines

| <u>Labor Category</u> | <u>8-hour TWA Exposure Level (ppm, mg/m³, other-specify)</u> | <u>15-Minute Peak Exposure Level (ppm, mg/m³, other-specify)</u> |
|-----------------------|---|---|
| A | Non detectable * | UK |
| B | Non detectable | UK |
| C | Non detectable | UK |
| D | Non detectable | UK |
| E | Non detectable | UK |
| F | Non detectable | UK |
| | | |
| | | |
| | | |
| | | |

* Less than 3 PPB

☐ Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

| Sample/Test | Work Area ID | Testing Frequency (per year) | Number of Samples (per test) | Who Samples ¹ | Analyzed In-House (Y/N) | Number of Years Records Maintained |
|-------------------------|--------------|------------------------------|------------------------------|--------------------------|-------------------------|------------------------------------|
| Personal breathing zone | 1 and 2 | 10 | 1 | A | Y | Indefinite |
| General work area (air) | 1 and 2 | 36 | 1 | A | Y | Indefinite |
| Wipe samples | N/A | N/A | N/A | N/A | N/A | N/A |
| Adhesive patches | N/A | N/A | N/A | N/A | N/A | N/A |
| Blood samples | N/A | N/A | N/A | N/A | N/A | N/A |
| Urine samples | N/A | N/A | N/A | N/A | N/A | N/A |
| Respiratory samples | 1 and 2 | 1 | 1 | MED | Y | Indefinite |
| Allergy tests | N/A | N/A | N/A | N/A | N/A | N/A |
| Other (specify) | | | | | | |
| | N/A | N/A | N/A | N/A | N/A | N/A |
| Other (specify) | | | | | | |
| | N/A | N/A | N/A | N/A | N/A | N/A |
| Other (specify) | | | | | | |
| | N/A | N/A | N/A | N/A | N/A | N/A |

¹Use the following codes to designate who takes the monitoring samples:

- A = Plant industrial hygienist
- B = Insurance carrier
- C = OSHA consultant
- D = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

| Sample Type | Sampling and Analytical Methodology |
|----------------------------|-------------------------------------|
| General work area (air) | MDA - 7100 - Toxic Gas Monitor |
| Resperatory | Pulmonary function test |
| | |
| | |

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

| Equipment Type ¹ | Detection Limit ² | Manufacturer | Averaging Time (hr) | Model Number |
|-----------------------------|------------------------------|--------------|---------------------|--------------|
| E | 0.002A | MDA | 8 | 7100 |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

¹Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify) _____

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) _____
- I = Other (specify) _____

²Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter (μ/m^3)

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency
(weekly, monthly, yearly, etc.)

Pulmonary / Resperator

Yearly

Chest X-Ray

Yearly

Blood pressure

Yearly

General exam

Yearly

☐ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Flexible slabstock foam manuf. process

Work area Foam lines

| <u>Engineering Controls</u> | <u>Used (Y/N)</u> | <u>Year Installed</u> | <u>Upgraded (Y/N)</u> | <u>Year Upgraded</u> |
|--|-----------------------|---------------------------|---------------------------|--------------------------|
| Ventilation: | | | | |
| Local exhaust | <u>Y</u> | <u>1979</u> | <u>Y</u> | <u>1987</u> |
| General dilution | <u>N</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| Other (specify) | | | | |
| <hr/> | | | | |
| Vessel emission controls | <u>N</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| Mechanical loading or packaging equipment | <u>Y</u> | <u>1973</u> | <u>N</u> | <u>N/A</u> |
| Other (specify) | | | | |
| <hr/> | | | | |

☐ Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Flexible slabstock foam manufacturing process

Work area foam lines

| <u>Equipment or Process Modification</u> | <u>Reduction in Worker Exposure Per Year (%)</u> |
|---|--|
| <u>Additional ventilation of 50,000 CFM</u> | <u>UK</u> |
| <u> </u> | <u> </u> |
| <u> </u> | <u> </u> |
| <u> </u> | <u> </u> |

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

[] Process type Flexible slabstock foam manufacture process

Work area Foam lines

| <u>Equipment Types</u> | <u>Wear or Use (Y/N)</u> |
|---------------------------|----------------------------------|
| Respirators | <u>Y</u> |
| Safety goggles/glasses | <u>Y</u> |
| Face shields | <u>N</u> |
| Coveralls | <u>Y</u> |
| Bib aprons | <u>Y</u> |
| Chemical-resistant gloves | <u>Y</u> |
| Other (specify) | |
| _____ | _____ |
| _____ | _____ |

[] Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Pour station

| Work Area | Respirator Type | Average Usage ¹ | Fit Tested (Y/N) | Type of Fit Test ² | Frequency of Fit Tests (per year) |
|-----------|---------------------------------|----------------------------|------------------|-------------------------------|-----------------------------------|
| 2 | Supplied Air Pos. Press. demand | A | Y | QL | 1 |
| | | | | | |
| | | | | | |
| | | | | | |

¹Use the following codes to designate average usage:

A = Daily
 B = Weekly
 C = Monthly
 D = Once a year
 E = Other (specify) _____

²Use the following codes to designate the type of fit test:

QL = Qualitative
 QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this CBI question and complete it separately for each process type and work area.

☐

Process type Flexible slabstock foam manufacturing process

Work area 1 and 2

Manual exposure monitoring

Respirator protection

Limited access

Training program

-
- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type Flexible slabstock foam manufacturing process

Work area foam lines

| <u>Housekeeping Tasks</u> | <u>Less Than Once Per Day</u> | <u>1-2 Times Per Day</u> | <u>3-4 Times Per Day</u> | <u>More Than 4 Times Per Day</u> |
|---------------------------|-----------------------------------|------------------------------|------------------------------|--------------------------------------|
| Sweeping | X | | | |
| Vacuuming | X | | | |
| Water flushing of floors | X | | | |
| Other (specify) | | | | |
| | | | | |

☐ Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure N/A

Yes 1

No 2

Emergency exposure

Yes 1

No 2

If yes, where are copies of the plan maintained?

Routine exposure: _____

Emergency exposure: _____

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

Yes ①

No 2

If yes, where are copies of the plan maintained? at foam locations

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

Yes ①

No 2

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

N/A

Plant safety specialist 1

Insurance carrier 2

OSHA consultant 3

Other (specify) _____ 4

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 10 ENVIRONMENTAL RELEASE

General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- | | |
|---|----|
| <input type="checkbox"/> Industrial area | 1 |
| Urban area | 2 |
| Residential area | ③ |
| Agricultural area | 4 |
| Rural area | 5 |
| Adjacent to a park or a recreational area | ⑥ |
| Within 1 mile of a navigable waterway | 7 |
| Within 1 mile of a school, university, hospital, or nursing home facility | ⑧ |
| Within 1 mile of a non-navigable waterway | ⑨ |
| Other (specify) _____ | 10 |

☐ Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude N.42 ° 39 ' 45 "

Longitude W.83 ° 2 ' 30 "

UTM coordinates Zone _____, Northing _____, Easting _____

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

N/A

Average annual precipitation inches/year

Predominant wind direction

10.04 Indicate the depth to groundwater below your facility.

N/A

Depth to groundwater meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of Y, N, and NA.)

CBI

☐

| On-Site Activity | Environmental Release | | |
|-----------------------------|-----------------------|-------|------|
| | Air | Water | Land |
| Manufacturing | N/A | N/A | N/A |
| Importing | N/A | N/A | N/A |
| Processing | Y | N | N |
| Otherwise used | N/A | N/A | N/A |
| Product or residual storage | Y | N | N |
| Disposal | N | N | N |
| Transport | N | N | N |

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

| | | |
|---|----------|-------------|
| *Quantity discharged to the air | 152.45 | kg/yr ± 2 % |
| Quantity discharged in wastewaters | 0 | kg/yr ± % |
| Quantity managed as other waste in on-site treatment, storage, or disposal units | 21,595.7 | kg/yr ± 2 % |
| Quantity managed as other waste in off-site treatment, storage, or disposal units | 0 | kg/yr ± % |

* Estimate arrived at by extrapolation from mass balance

☐ Mark (X) this box if you attach a continuation sheet.

10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manufacturing process

| <u>Stream ID Code</u> | <u>Control Technology</u> | <u>Percent Efficiency</u> |
|-----------------------|---------------------------|---------------------------|
| <u>No control</u> | <u>Technology used</u> | |
| | | |
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☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

CBI

☐

Process type Flexible slabstock foam manuf. process

Point Source
ID Code

Description of Emission Point Source

10.9 A

Mixing head flush

10.9 B

Pour station vent

10.9 C

Conveyor vent (includes ovens)

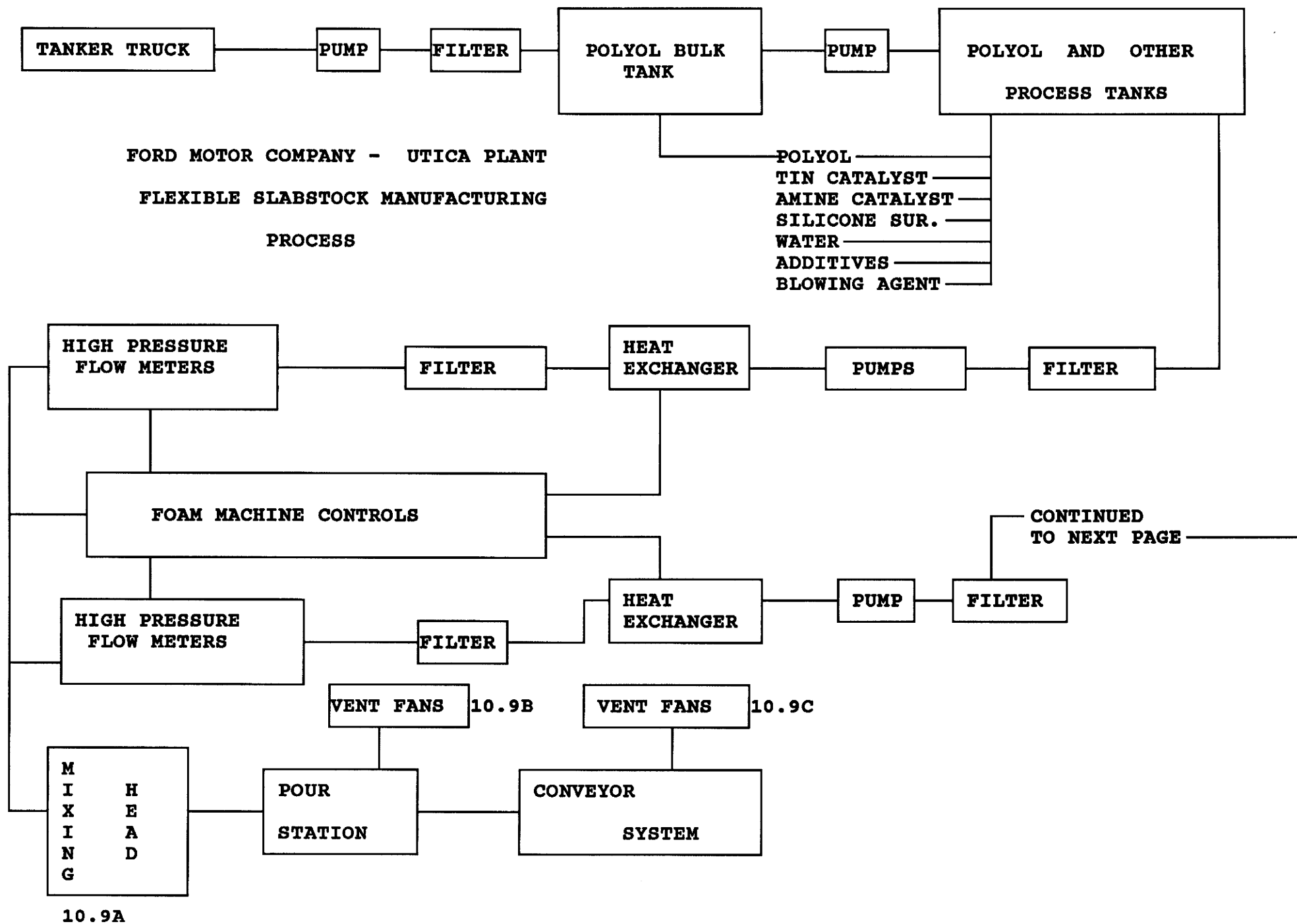
10.9 D

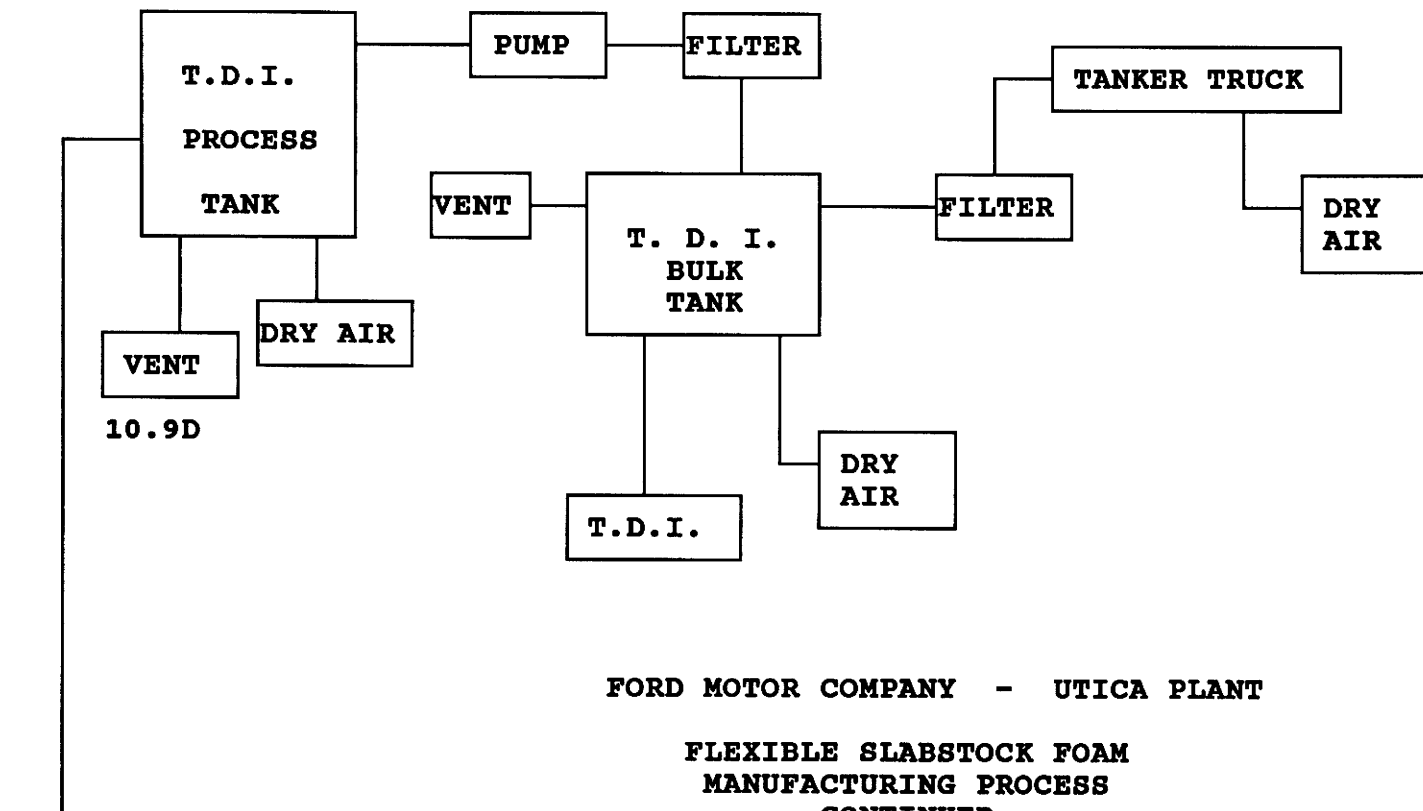
Day tank vent

10.9 E

Conveyor demold vent

☒ Mark (X) this box if you attach a continuation sheet.

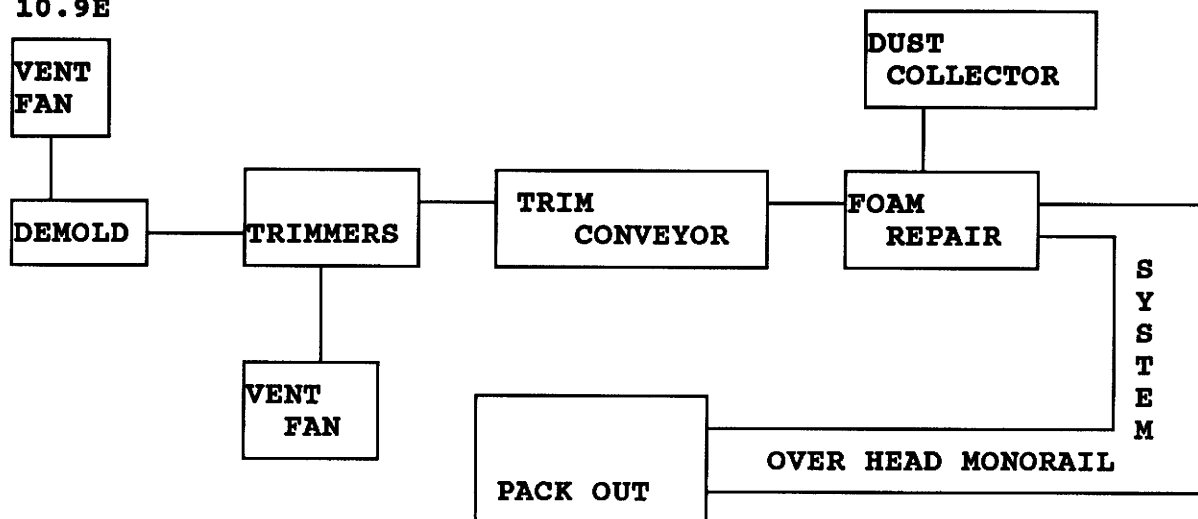




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FLEXIBLE SLABSTOCK FOAM
MANUFACTURING PROCESS
CONTINUED

10.9E



☐ Mark (X) this box if you attach a continuation sheet.

10.10 Emission Characteristics - - Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

| <input type="checkbox"/> Point Source ID Code | Physical State ¹ | Average Emissions (kg/day) | Frequency ² (days/yr) | Duration ³ (min/day) | Average Emission Factor ⁴ | Maximum Emission Rate (kg/min) | Maximum Emission Rate Frequency (events/yr) | Maximum Emission Rate Duration (min/event) |
|---|-----------------------------|----------------------------|----------------------------------|---------------------------------|--------------------------------------|--------------------------------|---|--|
| 10.9A | V | UK | 263 | 960 | UK | UK | Continuous | Continuous |
| 10.9B | V | UK | 263 | 960 | UK | UK | Cont. | Cont. |
| 10.9C | V | UK | 263 | 960 | UK | UK | Cont. | Cont. |
| 10.9D | V | UK | 263 | 960 | UK | UK | Cont. | Cont. |
| 10.9E | V | UK | 263 | 960 | UK | UK | Cont. | Cont. |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

¹Use the following codes to designate physical state at the point of release:

G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) _____

²Frequency of emission at any level of emission

³Duration of emission at any level of emission

⁴Average Emission Factor — Provide estimated (\pm 25 percent) emission factor (kg of emission per kg of production of listed substance)

10.11 Stack Parameters -- Identify the stack parameters for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

| Point Source ID Code | Stack Height(m) | Stack Inner Diameter (at outlet) (m) | Exhaust Temperature (°C) | Emission Exit Velocity (m/sec) | Building Height(m) ¹ | Building Width(m) ² | Vent Type ³ |
|-------------------------------|--------------------|--|--------------------------------|---|------------------------------------|-----------------------------------|---------------------------|
| 10.9A | 8.1 | 0.6 | Varies | UK | 9.8 | 207.8 | V |
| 10.9B | 8.1 | 0.6 | Varies | UK | 9.8 | 207.8 | V |
| 10.9C | 8.1 | 0.6 | Varies | UK | 9.8 | 207.8 | V |
| 10.9D | 8.1 | 0.6 | Varies | UK | 9.8 | 207.8 | V |
| 10.9E | 8.1 | 0.6 | Varies | UK | 9.8 | 207.8 | V |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

¹Height of attached or adjacent building

²Width of attached or adjacent building

³Use the following codes to designate vent type:

H = Horizontal

V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09.
Photocopy this question and complete it separately for each emission point source.

CBI

☐

Point source ID code N/A

Size Range (microns)

Mass Fraction (% \pm % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.

PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible slabstock foam manuf. process

Percentage of time per year that the listed substance is exposed to this process type 100 %

| Equipment Type | Number of Components in Service by Weight Percent of Listed Substance in Process Stream | | | | | |
|---|---|-------|--------|--------|--------|------------------|
| | Less than 5% | 5-10% | 11-25% | 26-75% | 76-99% | Greater than 99% |
| Pump seals ¹ | | | | | | |
| Packed | UK | | | | | |
| Mechanical | UK | | | | | |
| Double mechanical ² | | | | | | |
| Compressor seals ¹ | | | | | | |
| Flanges | UK | | | | | |
| Valves | | | | | | |
| Gas ³ | | | | | | |
| Liquid | UK | | | | | |
| Pressure relief devices ⁴ (Gas or vapor only) | | | | | | |
| Sample connections | | | | | | |
| Gas | | | | | | |
| Liquid | | | | | | |
| Open-ended lines ⁵ (e.g., purge, vent) | | | | | | |
| Gas | | | | | | |
| Liquid | | | | | | |

¹List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

²If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

³Conditions existing in the valve during normal operation

⁴Report all pressure relief devices in service, including those equipped with control devices

⁵Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

CBI

☐

| a. Number of Pressure Relief Devices | b. Percent Chemical in Vessel ¹ | c. Control Device | d. Estimated Control Efficiency ² |
|--|--|----------------------|--|
| 10 | 100 | None | UK |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

¹Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

²The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type UK

| <u>Equipment Type</u> | <u>Leak Detection Concentration (ppm or mg/m³) Measured at Inches from Source</u> | <u>Detection Device¹</u> | <u>Frequency of Leak Detection (per year)</u> | <u>Repairs Initiated (days after detection)</u> | <u>Repairs Completed (days after initiated)</u> |
|---|--|---|---|---|---|
| Pump seals | | | | | |
| Packed | UK | | | | |
| Mechanical | UK | | | | |
| Double mechanical | | | | | |
| Compressor seals | | | | | |
| Flanges | UK | | | | |
| Valves | | | | | |
| Gas | | | | | |
| Liquid | UK | | | | |
| Pressure relief devices (gas or vapor only) | | | | | |
| Sample connections | | | | | |
| Gas | | | | | |
| Liquid | | | | | |
| Open-ended lines | | | | | |
| Gas | | | | | |
| Liquid | | | | | |

¹Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

- 10.16 Raw Material, Intermediate and Product Storage Emissions - - Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block flow diagram(s).

CBI

☐

| Vessel Type ¹ | Floating Roof Seals ² | Composition of Stored Materials ³ | Throughput (liters per year) | Vessel Filling Rate (gpm) | Vessel Filling Duration (min) | Vessel Inner Diameter (m) | Vessel Height (m) | Operating Volume (l) | Vessel Emission Controls ⁴ | Design Flow Rate ⁵ | Vent Diameter (cm) | Control Efficiency (%) | Basis for Estimate ⁶ |
|--------------------------|----------------------------------|--|------------------------------|---------------------------|-------------------------------|---------------------------|-------------------|----------------------|---------------------------------------|-------------------------------|--------------------|------------------------|---------------------------------|
| F | N/A | 100 | 2,973,709 | UK | UK | 5 | 5 | 41,600 | N ₂ Blanket | N/A | UK | N/A | N/A |
| F | N/A | 80 | 75,310 | UK | UK | 5 | 5 | 41,600 | N ₂ Blanket | N/A | UK | N/A | N/A |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | |

¹Use the following codes to designate vessel type:

F = Fixed roof
 CIF = Contact internal floating roof
 NCIF = Noncontact internal floating roof
 EFR = External floating roof
 P = Pressure vessel (indicate pressure rating)
 H = Horizontal
 U = Underground

²Use the following codes to designate floating roof seals:

MS1 = Mechanical shoe, primary
 MS2 = Shoe-mounted secondary
 MS2R = Rim-mounted, secondary
 LM1 = Liquid-mounted resilient filled seal, primary
 LM2 = Rim-mounted shield
 LMW = Weather shield
 VM1 = Vapor mounted resilient filled seal, primary
 VM2 = Rim-mounted secondary
 VMW = Weather shield

³Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

⁴Other than floating roofs

⁵Gas/vapor flow rate the emission control device was designed to handle (specify flow rate units)

⁶Use the following codes to designate basis for estimate of control efficiency:

C = Calculations
 S = Sampling

PART E NON-ROUTINE RELEASES

10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

| <u>Release</u> | <u>Date Started</u> | <u>Time (am/pm)</u> | <u>Date Stopped</u> | <u>Time (am/pm)</u> |
|----------------|---------------------|---------------------|---------------------|---------------------|
| <u>1</u> | <u>None</u> | <u></u> | <u></u> | <u></u> |
| <u>2</u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>3</u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>4</u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>5</u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>6</u> | <u></u> | <u></u> | <u></u> | <u></u> |

10.24 Specify the weather conditions at the time of each release.

| <u>Release</u> | <u>Wind Speed (km/hr)</u> | <u>Wind Direction</u> | <u>Humidity (%)</u> | <u>Temperature (°C)</u> | <u>Precipitation (Y/N)</u> |
|----------------|---------------------------|-----------------------|---------------------|-------------------------|----------------------------|
| <u>1</u> | <u>N/A</u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>2</u> | <u></u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>3</u> | <u></u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>4</u> | <u></u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>5</u> | <u></u> | <u></u> | <u></u> | <u></u> | <u></u> |
| <u>6</u> | <u></u> | <u></u> | <u></u> | <u></u> | <u></u> |

☐ Mark (X) this box if you attach a continuation sheet.

APPENDIX I: List of Continuation Sheets

Attach continuation sheets for sections of this form and optional information after this page. In column 1, clearly identify the continuation sheet by listing the question number to which it relates. In column 2, enter the inclusive page numbers of the continuation sheet for each question number.

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.



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